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350 Mass  
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The Alliance for Business Leadership  
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Ceres  
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CT League of Conservation Voters  
Elders Climate Action - MA  
Environment America  
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Health Care Without Harm  
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League of Conservation Voters  
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Maine Climate Action Now  
Maine Conservation Voters  
Mass Audubon  
National Wildlife Federation  
Natural Resources Council of Maine  
New England Aquarium  
NASRCC (Carpenters Union)  
PowerOptions  
ReVision Energy  
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Cape Cod Chamber of Commerce  
Cape Cod Climate Change Collab.  
Climate Action Now, Western MA  
Climate Reality Project – MA  
Southcoast

October 17, 2022

Director Amanda Lefton  
Bureau of Ocean Energy Management  
1849 C Street, NW  
Washington, D.C. 20240

**RE: BOEM-2022-0045 – Draft Environmental Impact Statement  
for Revolution Wind, LLC’s Proposed Revolution Wind Farm  
Offshore Rhode Island**

Dear Director Lefton,

New England for Offshore Wind appreciates the opportunity to submit comments on the *Draft Environmental Impact Statement (DEIS) of Revolution Wind, LLC’s Proposed Revolution Wind Farm Offshore Rhode Island*, which was published to the Federal Register on September 2, 2022.

New England for Offshore Wind is a broad-based coalition of businesses and business associations, environmental and justice organizations, academic institutions, and labor unions that aims to drive regional collaboration and increased commitments to responsibly developed offshore wind in New England. We support an open and transparent engagement process for BOEM’s environmental review of the Revolution Wind project. BOEM’s swift and thorough review of Revolution Wind’s Construction and Operations Plan (COP) is critical to stand up this game-changing clean energy solution in a timely and responsible manner.

The responsible development of offshore wind energy provides an unrivaled opportunity to combat climate change while equitably advancing family-sustaining union jobs, economic development, community benefits, and environmental protection. We support the Biden-Harris Administration’s ambitious goal to responsibly advance 30 gigawatts (GW) of this clean energy solution by 2030 (with an additional 15 GW of floating offshore wind by 2035), and the thorough work underway at BOEM to fulfill these commitments.

As organizations working to help advance responsibly developed offshore wind power for New England, we appreciate the timely release of the Revolution Wind DEIS as a critical component of keeping our states on track to meet decarbonization goals. Offshore wind is our best opportunity for new sources of clean, renewable energy in New England, which boasts some of the best offshore wind resources in the country.<sup>1</sup> In New England,

<sup>1</sup> Offshore Wind Energy Technical Potential for the Contiguous United States, NREL, August 15, 2022, <https://www.nrel.gov/wind/offshore-resource.html>.

## Members (cont'd):

CT Sustainable Business Council  
E. Hampton Clean Energy Task Force  
Eastern Bank  
Eastern CT Green Action  
Energy Efficiency Associates, LLC  
Environment Council of RI  
Faith Communities Enviro. Network  
Flashover LLC  
Green Newton  
Greenwater Marine Sciences  
Offshore  
Hollis Line Machine  
IUPAT DCII  
Keuka Energy  
League of Women Voters MA  
MA AFL-CIO  
MassMEP  
Mass. Climate Action Network  
Mills Public Relations  
MOCA Westport  
Mothers Out Front  
Muggventures  
Nashoba Conservation Trust  
New Hampshire Audubon  
NH Businesses for Social  
Responsibility  
NH Citizens for Progress  
NH EEC Network  
People's Action for Clean Energy  
POWER-US | MA  
Rangel Renewables  
Rhode Island Building Trades  
Robert E Derecktor Inc.  
Seacoast Anti-Pollution League  
Self-Reliance  
Skunk Works Fund  
Turnstone  
University of Maine  
Vineyard Power Cooperative Inc.

each of the six states has a goal to reduce greenhouse gas emissions by at least 80% by 2050. In five of the six states, those emissions reductions are mandated by law, and three of them have also enacted 100% clean or renewable electricity mandates. These policies for greenhouse gas emissions reductions are economy-wide and are thus driving reductions across all sectors of the economy, with an emphasis on electrification. The successful electrification of the transportation and building sectors will require a significant increase in the availability of clean, renewable energy. Without offshore wind, which could provide nearly 50% of the power on our region's electricity grid by 2050,<sup>2</sup> it will be difficult to achieve the state mandates for clean energy and emissions reductions.

For example, in 2022, Rhode Island passed a law mandating that 100% of the state's power come from renewable energy by 2033,<sup>3</sup> and Connecticut adopted a requirement that 100% of its electricity be supplied by zero-carbon resources by 2040.<sup>4</sup> Offshore wind power has been determined to be a major component of Rhode Island's Act on Climate Plan for 2030<sup>5</sup> and a significant component of the necessary resource mix to achieve Connecticut's zero-carbon electricity standard.<sup>6</sup> Without Revolution Wind, it is highly unlikely that the states could achieve the mandates expressed in those laws.

The promise of offshore wind goes beyond decarbonization. We are committed to an offshore wind industry that creates high-quality union jobs, builds projects with content manufactured in America, delivers environmental justice and community benefits, and takes all action necessary to develop projects in an environmentally responsible manner by avoiding, minimizing and mitigating impacts to wildlife and natural resources. Home to the Block Island Wind Farm, Rhode Island residents have seen firsthand the benefits that come with this promising new industry—family-sustaining union jobs, business opportunities in the supply chain, increased tourism, reduced electricity costs, and pollution reduction.

The benefits of the Revolution Wind project will be even greater than those of Block Island, with the ability to deliver up to 880 MW of utility-

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<sup>2</sup> Weiss, Jürgen & Hagerty, John Michael, "Achieving 80% GHG Reduction in New England by 2050," *The Brattle Group*, slide 16, [brattle.com/wp-content/uploads/2021/05/17233\\_achieving\\_80\\_percent\\_ghg\\_reduction\\_in\\_new\\_england\\_by\\_20150\\_september\\_2019.pdf](https://brattle.com/wp-content/uploads/2021/05/17233_achieving_80_percent_ghg_reduction_in_new_england_by_20150_september_2019.pdf)

<sup>3</sup> An Act Relating to Public Utilities and Carriers – Renewable Energy, signed June 29, 2022, <http://webserver.rilin.state.ri.us/BillText/BillText22/HouseText22/H7277A.pdf>.

<sup>4</sup> Connecticut Public Act 22-5, An Act Concerning Climate Change Mitigation (signed May 10, 2022), <https://www.cga.ct.gov/2022/ACT/PA/PDF/2022PA-00005-R00SB-00010-PA.PDF>.

<sup>5</sup> Rhode Island Executive Climate Change Coordinating Council, "Additional Draft Chapters of the '2022 Update – Priority Actions for the Electric Sector,'" September 2, 2022, <https://climatechange.ri.gov/media/1101/download?language=en>.

<sup>6</sup> See Connecticut Department of Energy and Environmental Protection, *Integrated Resources Plan* (October 2021), <https://portal.ct.gov/-/media/DEEP/energy/IRP/2020-IRP/2020-Connecticut-Integrated-Resources-Plan-10-7-2021.pdf>.



scale renewable energy to our regional grid. At the same time, in the face of volatile energy prices, the timely development of this project could help stabilize utility bills. A recent analysis led by North Carolina State University showed that 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.<sup>7</sup>

As BOEM works towards issuing a final environmental impact statement (FEIS) for Revolution Wind, we want to underscore three factors that we believe are foundational to responsible development: (1) maximizing local economic benefits through prioritizing use of domestic content and ensuring creation of high-quality union jobs with equitable career pathways; (2) the importance of stringent protection of wildlife and habitat throughout every stage of project development and operation; and (3) robust engagement of community and expert stakeholders.

With these guideposts in mind, we urge you to consider the following:

### **Equitable Economic Development & Job Creation**

BOEM should choose a project alternative that allows for the project to meet the conditions of the project's three Power Purchase Agreements (PPAs), while producing the greatest economic benefit and protecting critical habitat, wildlife, and the environment.

Robust socioeconomic analysis is critical to achieve the maximum economic benefits from offshore wind projects. The FEIS should detail, to the greatest extent possible, all anticipated job-creation involving port utilization and development, supply chain and manufacturing of offshore wind components, construction, operations and maintenance, and decommissioning. In addition to salary, information should include health and safety, certifications, training pathways, recruitment and retention plans, project labor agreements and union neutrality commitments if applicable, and commitments and requirements for targeted hire of disadvantaged and underrepresented communities. While some of the details may not be available, the FEIS should reference agreements that are in place, such as the National Offshore Wind Agreement (NOWA) between Ørsted and North America's Building Trades Unions (NABTU) covering all of Ørsted's contractors and subcontractors for construction of the company's offshore wind projects. In addition, the FEIS should update background information regarding state commitments, including Rhode Island's recently passed legislation "Labor Standards in Renewable Energy Projects," which would extend to this project.<sup>8</sup> BOEM should also identify where information is unavailable or incomplete and why.

### **Environmental Protection**

The DEIS evaluates several alternatives to the Proposed Action that result in lesser or greater environmental impacts. BOEM has recognized that discrete aspects of the various identified alternatives could be combined in order to enhance the beneficial impacts of the project. The Preferred Alternative identified in the FEIS should identify and evaluate those opportunities in order to achieve the project objectives while minimizing adverse impacts to wildlife and environmental and cultural resources. For example, taking advantage of ongoing technological improvements, the FEIS should evaluate the

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<sup>7</sup> Science Daily, "Study finds offshore wind could drive down energy costs in New England, US." April 21, 2022. Available online: <https://www.sciencedaily.com/releases/2022/04/220421154138.htm>

<sup>8</sup> Rhode Island Senate Bill 2740, "Labor Standards In Renewable Energy Projects." June 29, 2022. Available online: [Bill Text: RI S2740 | 2022 | Regular Session | Comm Sub | LegiScan](#)



opportunity created by the deployment of larger turbine blades (“Alternative F”) to reduce the number of required turbine foundation sites and identify whether this reduction in the project footprint could accommodate turbine siting supportive of Habitat Impact Minimization (“Alternative C”) and address the tribal concerns considered in Reduction of Surface Occupancy to Reduce Impact to Culturally-Significant Resources (“Alternative E”) while maintaining the Proposed Action’s energy output to meet states’ climate goals.

### **Robust Stakeholder Engagement**

The FEIS should include information about stakeholder engagement and consultation with environmental justice populations and Native American Tribes. Several of the ports under development to become critical staging areas for offshore wind projects are considered environmental justice communities. The FEIS should include steps that are being taken to ensure these and other environmental justice communities are seeing economic benefits. In addition, long-term planning is necessary to ensure that the economic gains in these communities during offshore wind development are long-lasting. For this to happen effectively, developers and federal, state, and local entities must consult these communities at every step of the planning process.

The DEIS references a recent survey of commercial fishing crew members 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 or Latino. BOEM should ensure that all stakeholder engagement and mitigation related to impacts to commercial fishing, including the loss of gear, are conducted with appropriate language access.

### **Environmental Justice, Community Benefits, and Avoiding Adverse Impacts**

The DEIS notes that environmental justice populations may experience employment income benefits, but that the benefits would be no greater for environmental justice populations than those experienced by non-environmental justice populations. The FEIS should indicate what actions are planned to ensure that environmental justice populations have equitable access to these jobs and income benefits. For example, Rhode Island launched the Building Futures program in 2007 to leverage the Registered Apprenticeship model of workforce development and prepare diverse, low-income people for success in employment as registered apprentices in the building trades. The FEIS should include any plans to utilize programs such as this to improve access for people in environmental justice populations.

The DEIS states that environmental justice and Native American tribes will experience several adverse impacts. Community benefit agreements are one way to mitigate impacts, and BOEM should explore such agreements as an Environmental Protection Measure (EPM).

BOEM should also consider all impacts to environmental justice populations and Native American tribes, 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.

Offshore wind power could play a significant role in reducing pollution in our region. Per ISO-New England’s analyses, from one-sixth to one-third of New England’s old fossil fuel plants will likely retire



over the next decade,<sup>9</sup> and it is imperative that we fill any gap with clean energy. In addition to meeting state climate goals, decarbonization would reduce local co-pollutants and lead to improved air quality, which is a significant public health issue. Estimates of the local public health co-benefits of decarbonization are of the same order of magnitude as the climate-stabilization benefits alone.<sup>10</sup> The co-benefit potential of reduced emissions is especially high for our most vulnerable communities, which are systematically overburdened by fossil energy pollution.<sup>11</sup> In Appendix E2, Assessment of Resources with Minor (or Less) Impact Determinations, Table 3.4-3 reports Estimated Annual Avoided Emissions for the Operation of Future Offshore Wind within the Geographic Analysis Area. The averted pollution and the local co-benefits for public health is substantial (and its value could be estimated using an integrated assessment model). An environmental justice analysis of the averted pollution could specify the co-benefits to environmental justice communities that are now disproportionately affected.

Fossil fuel retirements will mean the loss of some high-quality employment in the sector. It is crucial that states ensure a just transition of these power plants and that offshore wind projects foster the creation of high-quality, family-sustaining jobs. Through the use of project labor agreements and community benefits agreements, offshore wind can create job transition opportunities for workers affected by this transition. The FEIS should consider these impacts in its analysis of all alternatives, particularly the “No Action Alternative.”

Without offshore wind, it is likely that fossil fuel energy facilities would either come online or be kept online to meet future power demand in New England. Therefore, BOEM should reject the “No Action Alternative” because it would drive up pollution, prevent states from achieving mandated climate goals, increase energy costs, and threaten grid reliability by continuing our region’s overreliance on fossil fuels for electricity generation.

Thank you for the opportunity to comment. This environmental review is an important step toward a bright, clean energy future for New England. We stand ready to work with the Biden-Harris Administration to help fulfill our region’s offshore wind commitments in a responsible way.

Sincerely,

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<sup>9</sup> “ISO New England Status of Non-Price Retirement Requests and Retirement De-List Bids,” *ISO New England*, Aug 17, 2018.

<sup>10</sup> Irene C Dedoussi et al 2019, The co-pollutant cost of carbon emissions: an analysis of the US electric power generation sector. *Environ. Res. Lett.* 14 094003 <https://iopscience.iop.org/article/10.1088/1748-9326/ab34e3/meta>

<sup>11</sup> Liu, et al. 2021, Disparities in Air Pollution Exposure in the United States by Race/Ethnicity and Income, 1990–2010. *Environmental Health Perspectives* <https://ehp.niehs.nih.gov/doi/10.1289/EHP8584#f4>

