

Director Dan Burgess
Maine Governor's Energy Office
62 State House Station
Augusta, Maine 04333

Chairman Admiral Gregory G. Johnson, USN-Ret.
Maine Offshore Wind Roadmap Advisory Committee

RE: Maine Offshore Wind Draft Roadmap – Public Feedback

Dear Director Burgess and Chairman Admiral Johnson,

Together with the organizations signed below, Maine Conservation Voters (MCV) appreciates the opportunity to submit comments in response to the request for public feedback for the Maine Offshore Wind Draft Roadmap issued by the Maine Governor's Energy Office (GEO) and the Maine Offshore Wind Roadmap Advisory Committee (AC). We are a broad-based coalition of environmental, justice, and labor organizations that strongly align with the state of Maine's goals for responsible offshore wind development in the Gulf of Maine. MCV appreciates the opportunity to have helped shape this document as a member of both the AC and the Energy Markets and Strategies Working Group.

We commend the GEO and AC for their work in highlighting the need for a comprehensive planning process that includes workforce and supply chain investment, a strategy for phased and collaborative procurement, and extensive environmental monitoring and mitigation. At the same time, we see room for improvement specifically regarding organized labor involvement and equity frameworks. All of these best practices are crucial components of responsible offshore wind development, and they are priorities for the groups represented in this letter.

We strongly support the Roadmap's goal of creating an offshore wind innovation hub in Maine that leverages the strength of existing Maine industries and fosters increased workforce and supply chain investments within the state. The Roadmap rightly highlights the groundbreaking role that the University of Maine has played in setting the stage for a booming offshore wind industry in Maine. The State should continue to take advantage of the University's capacity for research and innovation and its reputation for excellence in the development of offshore wind technology. While a central theme of the Roadmap is workforce development, there is significant room for improvement in the document's treatment of organized labor. "Labor organizations," "labor unions," and "union agreements" are only mentioned in passing three times throughout the document, only one of which is a concrete action. We encourage the GEO and AC to more thoroughly integrate organized labor throughout Objective 1 – Pursue Offshore Wind Supply Chain, Infrastructure, and Workforce Investments to Support Economic Growth and Resiliency and specifically mention the importance of project labor agreements (PLAs) and labor peace agreements (LPAs) to an uninterrupted and safe development environment that benefits workers, their families, and their communities. MCV and our labor allies on the AC have raised this concern at multiple AC meetings, and we are reiterating it here because it is so important. Organized labor must be a full partner in this process, not just a stakeholder, and we encourage the GEO and AC to revise the Roadmap to reflect this relationship.

The Roadmap correctly places procurement as the first and most urgent strategy under Objective 2 – Harness Abundant Renewable Energy to Control Costs and Fight Climate Change. Our research on recent successful New England state offshore wind procurements likewise indicates that a phased, regional, and Power Purchase Agreement (PPA) approach to offshore wind procurement is the best way to lock in increasingly affordable renewable electricity alongside other priorities such as environmental impact mitigation and joint transmission planning. We particularly encourage the GEO to continue engaging with the New England States Regional Transmission Initiative and to prioritize the development of “offshore backbone” transmission infrastructure, colocation of onshore transmission infrastructure with linear development, and utilization of existing substations, all with the intention of minimizing environmental impacts. In addition, as the State continues to innovate around direct applications of offshore wind energy, we discourage the pursuit of co-generation technologies such as blue (natural gas-derived) hydrogen and carbon capture when fossil-free technologies such as green (renewable-derived) hydrogen are being simultaneously developed.

We want to highlight and compliment as well the impressive attention to detail that the GEO and AC have paid to environmental and fisheries impacts in the Draft Roadmap. From extensive environmental monitoring and comprehensive mitigation strategies to targeted stakeholder outreach to fisheries communities, the Roadmap sets forth environmental goals commensurate with the climate and development challenges that lie ahead. We encourage the GEO and AC to directly name compensatory mitigation in the final draft of the Roadmap so as to ensure that adverse environmental impacts of development are consistently negated.

While the Draft Roadmap more than sufficiently outlines objectives, strategies, and actions for research, monitoring, and outreach for fisheries communities, there is ample room for improvement regarding the document’s equity provisions. When mentioning equity, the document refers to tribes and fisheries stakeholders, but not specifically to environmental justice (EJ) populations, disadvantaged communities, or low-income communities. Maine has the opportunity to create a new and thriving industry that can benefit its communities who have been marginalized and left behind, but only if they are specifically included and given a voice in the planning process. Referencing metrics such as the Economic Development Administration’s (EDA) economic distress criteria, the Climate and Economic Justice Screening Tool, and the Maine Social Vulnerability Index is a good start, but we encourage the GEO and AC to more thoroughly weave references to specific communities and potential benefits throughout the document. We encourage the GEO to continue advocating to Maine’s federal delegation in support of offshore wind revenue sharing mechanisms that will distribute benefits to communities that are at the forefront of climate change impacts such as sea level rise. We also support the Roadmap’s suggested action of “engag[ing] on the development of federal lease sale stipulations or multi-factor bidding components to advance the state’s interests.” We particularly recommend that the GEO advocate for the Bureau of Ocean Energy Management (BOEM) to award increased bidding credits for developers that choose to enter into community benefit agreements (CBAs) with impacted communities, informed by the system it instituted for the December, 2022 Outer Continental Shelf (OCS) lease sale in California.

Thanks to the painstaking research and collaboration that has gone into the development of this Roadmap, Maine is in a strong position to lead and capitalize on a burgeoning offshore wind industry that will bring countless good-paying jobs and abundant, affordable clean energy to communities throughout Maine. We thank the GEO and AC for their tireless efforts in bringing this opportunity to fruition, and we encourage

them to continue finding areas in the final document to detail and highlight how this Roadmap can benefit all Mainers.

Sincerely,

Kelt Wilska
Energy Justice Manager
Maine Conservation Voters
207-620-8811
kelt@maineconservation.org

Iron Workers Local 7
Laborers' International Union Local 327
Maine Audubon
Maine Climate Action Now
Maine Labor Climate Council
Maine State Building & Construction Trades Council
Natural Resources Council of Maine
North Atlantic Regional Council of Carpenters Local 349
North Atlantic Regional Council of Carpenters Local 352
Sierra Club Maine
Union of Concerned Scientists