BLUEGREEN ALLIANCE

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

March 7, 2023

Marian Swain
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100 Cambridge St #1020
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Re: 83c Round 4 Comments

Submitted electronically to: Marian.Swain@mass.gov

Dear Deputy Director Swain,

On behalf of our environmental and labor coalition members, thank you for the opportunity to weigh in at this vital moment in the development of offshore wind energy in the Commonwealth. We are proud of the leading role our state government has played in advancing clean energy, particularly with last year's clean energy and offshore wind legislation. Offshore wind presents a rare opportunity to develop the clean energy economy in a way that protects the environment and vulnerable species, and in a way that protects workers, communities, and advances racial and economic justice. The investments that the Legislature and Governor have made in the offshore wind industry demonstrate a shared commitment to this vision. We offer our input with a respect for the gravity of these public expenditures to advance private economic activity, as stated in the Act: to "develop and expand offshore wind industry-related employment opportunities in the Commonwealth and to promote renewable energy-related economic development in the Commonwealth by supporting and stimulating manufacturing and related supply chain capacity in the offshore wind industry."[i]

We appreciate and share the DOER's ethic that where public expenditure is made, public benefit must accrue. As our comments reflect, we believe that the public benefit does not begin and end with the lowest possible rates for electricity, though this is of course a vital priority. The long-term benefit of developing this industry in a way that creates high-road, family-supporting jobs in the Commonwealth, and that creates real pathways into these jobs for historically marginalized communities cannot be overestimated.

Our comments begin by addressing several of the questions put forward by the RFP) Drafting Parties, followed by deeper context and exposition of the proposals we put forward.

Economic Development, Workforce, and Diversity, Equity & Inclusion (DEI):

We applaud DOER's guidance in Section 13 of Appendix A to the third RFP, requiring bidders to submit specific job numbers, levels of compensation, and estimated impacts on economically distressed areas, and we encourage this fourth RFP to go one step further by incentivizing accountability for similarly measurable steps to provide high quality jobs and equitable access to economic opportunity.

Too often promises of "green jobs" have been made to transitioning workers or low-income communities with no durable pathways to those jobs and no enforceable commitments to wages or labor standards. The result is that most green jobs are low-road, non-union, minimum-wage jobs with little or no safety protections and people across Massachusetts have become disgusted with the concept in its entirety. These low-road jobs provide little ancillary benefit to the communities where workers reside, or to the Commonwealth as a whole. We cannot afford to make this mistake in offshore wind.

Specifically, we encourage DOER to provide guidance to bidders in this solicitation, explicitly crediting those who make the following guarantees:

1) Workers will receive at least the applicable Davis-Bacon prevailing wage rate throughout the project;
2) The developer will partner with local community organizations and labor unions through an enforceable Community Benefits Agreement, to engage transitioning workers and economically distressed communities in workforce development, pre-apprenticeship, and apprenticeship programs that form a pathway to high quality careers in offshore wind;
3) The developer commits to union neutrality and makes every effort to negotiate a Project Labor Agreement with all relevant unions throughout construction; and a Labor Peace Agreement throughout operations and management of the project, at port facilities, and for the manufacturing of offshore wind components related to the project. Developers who already have entered into such agreements should be rated more highly than those who have not;
4) Employment on the project will include at least the minimum participation of apprentices required for the full Energy Investment Tax Credit (U.S. Code Sec.

45(b)(8)(C)). Apprentices must work a certain percentage of the total labor hours based on when construction began of the qualified facility:

   a) Construction began before January 1, 2023: 10% of total labor hours
   b) Construction began after December 31, 2022, and before January 1, 2024: 12.5% total labor hours
   c) Construction begins after December 31, 2023: 15% total labor hours[ii]

5) The developer commits to maximizing the use of offshore wind components manufactured in-state and commits to utilizing domestic content at the minimum required for the domestic content preference 10% bonus Production Tax Credit for offshore wind projects as follows:
   a) 20% before 2025
   b) 27.5% starting in 2025
   c) 35% starting 2026
   d) 45% starting 2027
   e) 55% starting 2028[iii]

Requiring that developers commit to maximizing the use of offshore wind components manufactured in-state will not only increase economic benefits to the Commonwealth, it also advances equity. 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 who experience discrimination limiting access to better-paying jobs.[iv] 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.[v]

<u>Inflation, Supply Chain, and Macroeconomic Factors:</u>

One of the greatest threats to the timely development of offshore wind energy in the United States - and to the success of this solicitation - is competition for scarce components, as global manufacturers work to support massive scaling up of offshore wind across Europe to replace Russian oil and gas.

The March 2022 domestic supply chain report from the National Renewable Energy Laboratory (NREL) concludes, “most components in the early 2020s will be sourced from European suppliers while domestic manufacturing facilities are being planned and constructed. However, it is unlikely that international suppliers will have sufficient throughput to support the construction of both European and U.S. offshore wind energy projects. If a domestic supply chain is not developed in time, bottlenecks in the global

supply chain will present a significant risk to achieving the national offshore wind energy target."[vi]

We believe that the goal of avoiding these bottlenecks, as well as the goal of developing a thriving green economy in Massachusetts, is well served by applying a **minimum domestic content preference** for selected projects that is consistent with the Production Tax Credit, and a waiver process for cases where content is not available domestically or in the public interest. Domestic content preferences are a long-standing practice by the federal government and many state governments to create a procurement preference for American-made goods when they are available in sufficient quality and quantity and are competitively priced in the global marketplace. These preferences have been recognized by U.S. courts as permissible where public entities are acting as a market participant.

Domestic content preferences would support the critical endeavor of securing a domestic offshore wind supply chain. The modeling in the NREL report also shows that maximizing use of domestic content in offshore wind projects deployed to achieve 30 GW by 2030 could support the creation of up to an additional 49,000 jobs annually.[vii]

According to Princeton University, even a modest increase in domestic content across renewables 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.[viii] These increased benefits are not likely to come at additional cost. In the rare occurrence that domestic content requirements would increase project costs or that unavailability of any component would slow development, waivers can be issued. Consistent with application of Buy America policy in other sectors, waivers are also issued for domestic content requirements if domestically manufactured materials or manufactured goods are not available in the United States, would result in unreasonable price increases for the project, or the waiver issued is in the public interest.

Federal Funding:

a. How could 83C Round 4 be designed to ensure Massachusetts ratepayers receive the maximum benefits of the new federal funding opportunities, tax credits, and/or other programs available to offshore wind developers under the Bipartisan Infrastructure Law (BIL) and Inflation Reduction Act (IRA)?

The full 30% value of the Energy Investment Tax Credit is available only to developers who adhere to prevailing wage standards and hit benchmarks for apprentice labor participation described above.

Furthermore, accessing the cost-saving potential of the 10% domestic content bonus in the Production Tax Credit (PTC) and Investment Tax Credit (ITC) within the Inflation Reduction Act (IRA) requires that projects utilize at least 25% domestic content by 2026, 45% by 2027, and 55% by 2028. Setting a domestic content preference at a capacity equal or greater to what's required in the IRA will help to ensure that projects maximize job creation as well as cost savings of the PTC and ITC. Issuing waivers has been a proven method for ensuring projects aren't slowed down when these requirements cannot be meant.[ix]

For the full economic benefit of these federal tax credits to accrue to Massachusetts taxpayers and ratepayers, the measures we propose above should be incentivized with explicit credits in the bidding process.

Application Process and Evaluation Framework:

We support requirements for bidders to submit audited financial statements and disclose in detail business bankruptcies, defaults, disbarments, investigations, indictments, or other actions against either the developer, its parent company, affiliates, subsidiaries, or any key employees. In addition to these, we urge you to consider requiring additional data including but not limited to current benefits and wage scales, diversity, corporate governance policies, labor disputes, workplace safety audits, and CEO/median pay ratio. Within the project description, bidders should also be required to submit standards and procedures related to safety and training and their plans for operating within those standards, including oversight and enforcement.

We strongly recommend that DOER establish an oversight committee to be part of the evaluation process and oversee the selected project through its development. We recommend the oversight committee consist of construction, utility and industrial unions, environmental nonprofits, social justice groups, and coastal overburdened communities meeting low income and minority criteria. This committee would provide critical support in regards to stakeholder engagement, job creation, workforce training, supply chain, and community benefits. In order to ensure transparency and accountability for the jobs and training commitments made by winning bidders, these commitments should be made publicly available and updated with quarterly or annual progress updates. This type of transparency and oversight would ensure that the project(s) selected live up to the potential to be transformative solutions to the intersecting crises of climate change and economic inequality and further establish Massachusetts as a leader in offshore wind.

Sections of the RFP describing the evaluation of non-price considerations should include greater specificity about not just the number of jobs created, but information related to

the quality of those jobs to ensure the creation of high-wage, family sustaining careers with equitable pathways for a diverse workforce. Guaranteed employment impacts should be given more weight than not guaranteed, and we urge DOER to further clarify that high-quality jobs will be given more weight than low-quality. This section should also specify that high-quality jobs pay a family-sustaining wage; allow workers the free and fair choice to join a union; utilize codes of conduct that include health and safety committees where applicable; commit to diversity, equity, and inclusion; have processes for workers to issue and resolve disputes; utilize industry-recognized training programs with stackable credentials; and that employers committed to remaining neutral in any union organizing effort will be given more weight than those that do not.

Stakeholder Engagement:

Effective stakeholder engagement reduces the burden of stakeholders and creates accountability for Awardees. We recommend that the DOER require Awardees to provide quarterly updates made publicly available on their stakeholder engagement plan that includes measures taken to incorporate stakeholder feedback. We also recommend requiring bidders to describe their plans for reducing the burden of impacted stakeholders such as by setting expectations up front, letting stakeholders know how their input will be used, engaging stakeholders in setting priorities and measuring progress, and identifying what information or resources stakeholders might need to engage. Bidders should also be required to submit a target stakeholder engagement schedule that details the timeframe for engaging diverse groups at key stages of project development and why.

Community Benefits & Equitable Access for a Diverse Workforce:

We strongly advocate for DOER to add provisions that require Awardees to meet targeted hire requirements, minimum contracting with Disadvantaged Business Enterprises (DBEs) and to enter into enforceable Community Benefits Agreements (CBAs) that can maximize the public benefit from offshore wind projects. When DOER and relevant agencies enter into contracts with offshore wind developers, manufacturers and operators, these companies should commit to high quality jobs and equity measures to ensure existing and future workers and their communities also benefit with jobs and training opportunities.

CBAs are binding agreements between a private company and a coalition of community and labor groups. CBAs outline commitments to a range of high-road job standards and equity measures including workforce training to meet the specialized needs of relevant industry. CBA goals and commitments are up to the local community coalition and the company and often include union neutrality and at a minimum include commitments to diverse hiring, and a jobs pipeline with skills training. Companies benefit from the broad

expertise of community, workforce, education, labor, and environmental partners to hire well-trained people from the local community, focusing particularly on supporting people of color, women, veterans, and returning citizens who face systemic barriers to manufacturing careers.

The DOER should require that all CBAs include (1) a Social Characterization Assessment where applicants include a brief writeup of the community dynamics and decision making process; (2) an Initial Stakeholder Analysis Summary where applicants identify the stakeholders, sectors, labor unions, communities, organizations, etc., involved with an affected by the proposed projects; (3) a Two-Way Engagement Statement in which the applicant discusses how program implementation incorporates community input for all aspects of the project within Massachusetts and the extent to which the host communities have indicated support; (4) a Comprehensive Plan for the Creation and Retention of High Quality Jobs and Development of a Skilled Workforce which the applicant describes worker health and safety and protection of workers' rights to organize a union as well as the description of the proposed effort to include workers in the design and execution of workplace safety and health plans and how workplace health and safety and the right to join a union will be ensured, (5) a Risk Management Plan in which the applicant analyzes all risks associated with the project, their plan for managing such risks and strategies for building and maintaining a strong safety culture that encourages open communication about safety and lessons learned; and (6) a Free from Harassment and Discrimination Statement in which applicants address how workers will be protected from harassment and discrimination, how retention rates will be measured, and how worker and workplace concerns will be addressed. These recommendations are consistent with the recent Department of Energy Funding Opportunity Announcement for Carbon Capture Demonstration Projects (DE-FOA-0002738:BIL).[x]

Public agencies particularly in early electric vehicle adopting states like California, New York, and Illinois, are increasingly scoring companies based in part on **job quality, training opportunities, and equitable hiring**. CBAs are a win-win for communities, offshore wind developers, and manufacturers. Manufacturers doing business in the U.S. are facing a shortage of skilled and middle-skilled workers to fill the demand for machinists, welders, computer-controlled machine operators and other key positions. CBAs help manufacturers develop and train a skilled workforce while creating good jobs with benefits for working families.

Our allies have developed policy tools like the federally-approved U.S. Employment Plan (USEP)[xi] that can be utilized in bidding processes to incentivize companies to create good jobs in the U.S. These policy tools allow for community and labor coalitions to negotiate CBAs allow coalitions of community-based groups, workforce development organizations,

labor unions, and other social justice advocates to ensure even deeper equity commitments and high-road hiring practices at these sites and facilities. We recommend DOER require the U.S. Employment Plan in this fourth solicitation in order to achieve strong CBAs.

The USEP could also be used to set commitments for diversity and community-inclusive goals and require that Awardees provide regular reports on their progress towards those goals and the efforts being made to achieve them. This can include diversity within the workforce as well as contractors, including minimum targets for Disadvantaged Business Enterprises (DBEs), Minority-and Women-owned Business Enterprises (MWBEs) and veteran-owned business enterprises. Such goals should be established in proportion to the population of Massachusetts, and efforts should be made to understand the obstacles that these workers and individuals face and targeted efforts to remove these obstacles. We discuss this in greater detail in the next section that contains recommendations that could also be executed through a community benefit agreement.

Equitable Access to Training:

The solicitation should require bidders to submit information about training programs related to the jobs benefits they describe. This information should include strategies to provide equitable training access for a diverse workforce such as partnerships with unions, earn-while-you-learn registered apprenticeship and pre-apprenticeship programs, recruitment strategies such as establishing partnerships with community groups, retention strategies such as providing wrap around services, and career development such as requiring job interviews upon completion of a training program.

Registered apprenticeships and pre-apprenticeship programs, particularly for construction, offer a proven earn-while-you-learn model that creates greater access to training. Apprenticeships and pre-apprenticeships or "workforce readiness" programs combine hands-on training with classroom training to cater to different learning styles and produce a well-trained workforce. Apprenticeship programs registered with the Department of Labor are subject to regulations that include equal employment opportunity which help businesses reach a larger and more diverse pool of workers.[xii] For non-construction work, training programs that are industry-recognized, have stackable credentials, are portable, and are accredited or state or federal-registered union training programs of labor-management training programs actively engaged in representing transitioning employees from non-renewable generation facilities or training programs partnering with such labor organizations should be prioritized. When these programs are paired with recruitment strategies such as partnering with a community group to provide information about workforce and training opportunities and wrap around services, the

benefits can be even greater. Wrap around services at minimum should include transportation, child care assistance, and technology support. Many examples of programs providing such services can be found in a recent White House Fact Sheet.[xiii]

Job Quality:

As described above, the solicitation should include minimum job quality standards including safety, union neutrality, prevailing wage, employee benefits, and project labor agreements or community workforce agreements. At the very least, these job quality standards should be explicitly considered in the evaluation of projects. Job quality standards will benefit all Massachusetts residents and ensure projects maximize the benefits they deliver to the state. Project Labor Agreements (PLAs) for construction specifically can reduce project cost for developers, save public funds in the long run, and result in increased economic benefits for the local economy.[xiv] Reports indicate that PLAs decrease the significant gap between expected and realized energy savings in various energy efficiency measures.[xv] PLAs ensure use of a skilled workforce and often avoid labor disputes which allows for a project to move forward with greater efficiency. Workers are also benefited by utilizing PLAs, even nonunion workers, because they ensure that wages and benefits are defined and protected at local standards. Most importantly, PLAs often lead to safer working conditions. Accidents, including death, are more common in states with low-road contractors.[xvi] A recent report based on OSHA data found that union worksites are 19% less likely to have an OSHA violation and had 34% fewer violations per OSHA inspection than non-union worksites.[xvii]

Labor Peace Agreements (LPAs) are also essential to ensure that workers outside of the construction sector have access to benefits and that their rights to organize a union and bargain collectively are respected. Union neutrality commitments and LPAs ensure that workers have the free and fair choice to join a union without employer involvement as guaranteed in the National Labor Relations Act. The Bureau of Labor Statistics reports that non-union workers earn 83% of what unionized workers earn and that when workers have unions, wages rise for union and nonunion workers.[xviii] Furthermore, a White House report, "Working Organizing and Empowerment" states that union approval is at its highest since 1965, with 68% of Americans approving of labor unions. 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.[xix]

Transmission

How should the 83C Round 4 requirements regarding transmission and interconnection of proposed projects be designed to maximize efficient use of the onshore transmission system?

DOER should consider identifying options for preferred points of interconnection (POIs) and incentivizing bidders to optimize use of POIs with a fast-track interconnection process (first-ready/first-served). In doing so, DOER may ensure offshore generation is connected to the onshore grid in areas where the least environmental impacts occur, encourage efficient use of the onshore transmission system, prevent unnecessarily costly onshore upgrades, and create important focal points to guide regional planning as POIs with significant capacity near load centers can inform a larger regional offshore grid proposal

DOER should also coordinate with the Department of Energy, grid operators, and offshore generation and transmission developers to develop and implement "network-ready" standards for modular offshore substations and export cables to ensure physical and functional compatibility and expandability of offshore transmission infrastructure. Through network ready standards, Massachusetts can then require such network-ready capabilities in future offshore wind transmission and generation procurements thereby enabling any export links built today to effectively inform a planned offshore network in the future.

Please comment on potential ways to integrate 83C Round 4 with ongoing regional transmission initiatives, including the Joint State Innovation Partnership for Offshore Wind.

We enthusiastically support the Joint State Innovation Partnership for Offshore Wind. Regional transmission for offshore wind will be critical to increasing reliability and unlocking the full potential of offshore wind on our shared grid. We suggested a lower procurement target for this round because we believe that the sooner we move away from a generator lead line approach and toward a planned regional approach for transmission, the lower the costs and impacts will be. The recent report by The Brattle Group on planned, networked transmission found that pursuing this strategy immediately would result in at least $20 billion in transmission-related cost savings nationally; 60-70% fewer shore crossings and necessary onshore upgrades; approximately 50% fewer miles of submarine transmission cable installations; and enhanced reliability and resilience.

While moving directly to a planned regional approach would be the most cost-effective and efficient path forward, we support DOER exploring potential ways to integrate the

Round 4 project(s) with regional transmission initiatives. To drive that integration, DOER could require a specific type of transmission technology for this solicitation so that it aligns with proposed regional plans. The Modular Offshore Wind Integration Plan (MOWIP) is based on the use of long-distance High Voltage Direct Current (HVDC) cables. A generator lead line approach for the next project(s) could integrate into a regional network if it uses the same technology and allows for the project to mesh into a future regional grid.

Additionally, DOER should develop an actionable cost allocation framework encompassing their offshore wind commitments within each region. The framework should clearly identify: 1) which costs and benefits should be determining factors and how DOER would quantify and monetize the costs and benefits.

Finally, DOER should adopt similar language to the last Rhode Island solicitation. The Rhode Island solicitation requires winning bidders to enter into a Commitment Agreement to negotiate a transmission service agreement with the owner of regional transmission facilities, if they become available before the commercial operation date of the project(s). If DOER adopts an approach similar to Rhode Island, DOER should weigh the cost implications with input from generation and transmission developers. This includes weighing whether the generation bids should include transmission at the initial bidding, or whether it would be more cost effective to provide an option for bidders to rebid later if regional transmission facilities are created.

Please comment on the advantages and challenges of the "Meshed Ready" transmission requirement in the 2022 NYSERDA offshore wind RFP (ORECRFP22-1) and what factors would need to be considered for such an approach to be applicable in a Section 83C solicitation.

As noted above, moving as soon as possible to a planned, regional, and interregional approach for transmission would be the most cost-effective and efficient path forward.; In practice, this would take the form of a backbone offshore-grid. However, instituting some form of a "Meshed Ready" transmission approach in 83C Round 4 could be an appropriate interim step. The advantages of such an approach would be that it could ensure future integration of the project(s) into a regional transmission network that may not be available until after their commercial operation date.

The challenge with the 2022 NYSERDA "Meshed Ready" requirement is that the assumption was for an HVAC networked grid. If DOER is exploring pursuing this approach for 83C Round 4, they should require a "Mesh Ready" approach that would use

the same HVDC technology that will be utilized for the MOWIP. It is possible that the "Mesh Ready" approach could add unnecessary costs – DOER should conduct an analysis of the costs and benefits of this approach.

Environmental and Fisheries Impacts:

How could 83C Round 4 be designed to best encourage project designs that avoid, minimize, and mitigate negative impacts on the environment and fishing industry? Please refer in particular to Appendix J of 83C Round 3 and to the relevant provisions in Section 61 of An Act Driving Clean Energy and Offshore Wind.

In 83C Round 3, we appreciated the inclusion of Appendix J and the increased level of detail it provided, relative to past solicitations, to help ensure a baseline set of expectations for the mitigation and monitoring of impacts to marine wildlife and habitat; data transparency; stakeholder engagement; and compliance and consistency with the Massachusetts Ocean Management Plan and other state and regional ocean management plans. Our recommendations aim to provide further clarity on necessary requirements to ensure all selected bids are well-positioned for successful permitting and to avoid, minimize and mitigate environmental impacts to the greatest extent practicable.

As stated above, we call for transparency in the evaluation process, and for environmental impact mitigation plans of the highest quality possible at the time of bidding to be given significant weight in the selection process. This aligns with the requirement in An Act Driving Clean Energy and Offshore Wind that the department give preference to proposals that demonstrate benefits from "mitigation, minimization, and avoidance of detrimental environmental and socioeconomic impacts."

To ensure useful and comparable submissions, we urge the requirement of initial environmental impact mitigation plans that include, but are not limited to: explicit descriptions of best management practices, and any mitigation (on- or off-site) the bidder commits to employing, informed by the best available science that will avoid, minimize, and mitigate impacts to: wildlife, including but not limited to threatened or endangered species such as North Atlantic right whales; coastal and marine habitats and ecosystems; natural resources; benthic resources and essential fish habitat; and traditional or existing water-dependent uses. It is critical that the plan also include robust monitoring before, during, and post-construction to fully understand the potential adverse effects of development, operations, and decommissioning on fisheries, marine habitat, marine and avian wildlife species, sea turtles, bats, and terrestrial migratory birds.

In addition, contract terms should require that offshore wind developers use adaptive management strategies in response to monitoring results, such that new technologies can

be incorporated to better monitor interactions and minimize detrimental impact for the operational life of the project.

An Act Driving Clean Energy and Offshore Wind requires that evaluators produce a numeric score for each bid's plans for financial and technical assistance to support wildlife habitat and monitoring. We urge you to make explicit in the final solicitation how this numeric score will be weighted in the selection process, and that it accounts for no less than 5% of selection criteria. The solicitation should set a minimum requirement that bidders provide a $10,000 per megawatt contribution to regional research and monitoring efforts to inform strategies to avoid and mitigate any adverse impacts to the marine environment, as recently and consistently required in offshore wind solicitations in New York and New Jersey. The Department of Energy Resources should work in consultation with the Habitat and Fisheries Working Groups to determine how the funds will be used to advance the responsible development of the offshore wind energy industry, not necessarily the proposed project.

We appreciate the requirement for compliance and consistency with state and regional ocean management plans and wish to underscore that analysis of environmental impact mitigation plans should be based on quantitative and qualitative evaluation criteria that are developed through robust stakeholder engagement and utilize the best available science. Finally, proposals should include an appropriate suite of mitigation measures for the critically endangered North Atlantic right whale as well as other protected species, tailored to the specific project site and based on the best available science.

Conclusion

Deploying offshore wind in a way that utilizes high-road employment practices, maximizes economic benefits, provides equitable access to these opportunities, and protects the environment provides a transformational solution to the intersecting crises of economic inequality and climate change that Massachusetts residents face. We hope that you implement our recommendations and we thank you for your work to advance offshore wind in a way that delivers maximum benefits to our Commonwealth.

Signed,

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Endnotes

[i] Massachusetts General Law, Chapter 23j, §8A

[ii] Inflation Reduction Act Part 1, Sec 13101 (f)(8)(A)(i) Available online: https://www.congress.gov/bill/117th-congress/house-bill/5376/text

[iii] Inflation Reduction Act Part 6, Sec 13701 (a)(g)(11)(C)(ii) Available online: https://www.congress.gov/bill/117th-congress/house-bill/5376/text

[iv] Robert E. Scott, Valerie Wilson, Jori Kandra, and Daniel Perez: *Botched policy responses to globalization have decimated manufacturing employment with often overlooked costs for Black, Brown, and other workers of color,* at page 2. (January 31, 2022). Available online: https://files.epi.org/uploads/239189.pdf

[v] Ibid, page 3

[vi] Shields, Matt et al. 2022. The Demand for a Domestic Offshore Wind Energy Supply Chain. Golden, CO: National Renewable Energy Laboratory. Page vii. Available Online: https://www.nrel.gov/docs/fy22osti/81602.pdf.

[vii] Ibid

[viii] Erin N. Mayfield and Jesse D.Jenkins, *Working Paper: Influence of High Road Labor Policies and Practices on Renewable Energy Costs, Decarbonization Pathways, and Labor Outcomes*, April 13, 2021. Available online: https://netzeroamerica.princeton.edu/img/Working_Paper-High_Road_Labor_and_Renewable_Energy-PUBLIC_RELEASE-4-13-21.pdf

[ix] For more information on waivers, see "DOT's Identification of Federal Financial Assistance Infrastructure Programs Subject to the Build America, Buy America Provisions of the Infrastructure Investment and Jobs Act," January 2022, Available Online: www.transportation.gov/sites/dot.gov/files/2022-01/DOT%20Report%20on%20Financial%20Assistance%20Infrastructure%20Programs.pdf

[x] Available online: https://oced-exchange.energy.gov/Default.aspx#FoaId82c73432-65b4-4d82-b03c-d61a6fcfe2a0

[xi] Jobs to Move America, U.S. Employment Plan, April 10, 2022. Available Online: https://jobstomoveamerica.org/resource/u-s-employment-plan-2/

[xii] How You Can Benefit From Diversity, Equity, Inclusion, and Accessibility in Apprenticeship. Available online: https://www.apprenticeship.gov/employers/diversity-equity-inclusion-accessibility

[xiii] The White House: FACT SHEET: President Biden Celebrates New Commitments toward Equitable Workforce Development for Infrastructure Jobs, November 2, 2022. Available Online: https://www.whitehouse.gov/briefing-room/statements-releases/2022/11/02/fact-sheet-president-biden-celebrates-new-commitments-toward-equitable-workforce-development-for-infrastructure-jobs/

[xiv] Frank Manzo et al., *Efficiencies of Project Labor Agreements*, 2015. Available online: https://illinoisepi.org/site/wp-content/themes/hollow/docs/wages-labor-standards/Illinois-PLAs-in-CDB-Projects-FINAL.pdf

[xv] Ibid

[xvi] Donald Vial et al., *Workforce Issues and Energy Efficiency Programs: A Plan for California's Utilities*, 2014. Available online: https://laborcenter.berkeley.edu/pdf/2014/WET-Plan-Appendices14.pdf

[xvii] Leah Ford, Jeffrey Freund, "The Connection Between Unions and Worker Safety," U.S. Department of Labor Blog, May 11, 2022. Available online: https://blog.dol.gov/2022/05/11/the-connection-between-unions-and-worker-safety

[xviii] U.S. Department of Labor, *The Union Advantage.* Available Online: https://www.dol.gov/general/workcenter/union-advantage

[xix] White House Task Force on Worker Organizing and Empowerment, Report to the President. Available Online: www.whitehouse.gov/wp-content/uploads/2022/02/White-House-Task-Force-on-Worker-Organizing-and-Empowerment-Report.pdf