



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

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Comments on the Bureau of Ocean Energy Management’s (BOEM) preparation of an Environmental Assessment (EA) for future commercial wind lease issuance on the Pacific Outer Continental Shelf (OCS) off the coast of Humboldt County, California

On behalf of the BlueGreen Alliance, our partners, and the millions of members and supporters they represent, we thank you for the opportunity to submit these comments to inform the preparation by the Bureau of Ocean Energy Management (“BOEM”) of an Environmental Assessment (EA) under the National Environmental Policy Act (NEPA) for future commercial wind lease issuance on the Pacific Outer Continental Shelf (OCS) off the coast of Humboldt County, California.

We thank you in advance for your consideration of possible consequences associated with issuing commercial wind leases, and associated site characterization activities and site assessment activities off of the coast of northern California. A thorough federal analysis is necessary for projects to move nimbly through the permitting process in compliance with state and federal laws, and for all offshore wind projects to rise to this industry’s potential as a transformational solution to the intersecting environmental, public health, and economic crises of our time. As the White House wrote in its recent offshore wind Fact Sheet:¹

“The President recognizes that a thriving offshore wind industry will drive new jobs and economic opportunity up and down the Atlantic Coast, in the Gulf of Mexico, and in Pacific waters. The industry will also spawn new supply chains that stretch into America’s heartland, as illustrated by the 10,000 tons of domestic steel that workers in Alabama and West Virginia are supplying to a Texas shipyard where Dominion Energy is building the Nation’s first Jones Act compliant turbine installation vessel.

“Federal leadership, in close coordination with states and in partnership with the private sector, unions and other key stakeholders is needed to catalyze the deployment of offshore wind at scale.

¹ White House, FACT SHEET: Biden Administration Jumpstarts Offshore Wind Energy Projects to Create Jobs, <https://www.whitehouse.gov/briefing-room/statements-releases/2021/03/29/fact-sheet-biden-administration-jumpstarts-offshore-wind-energy-projects-to-create-jobs/>

“...the Administration is taking coordinated steps to support rapid offshore wind deployment and job creation:

1. Advance ambitious wind energy projects to create good-paying, union jobs
2. Investing in American infrastructure to strengthen the domestic supply chain and deploy offshore wind energy
3. Supporting critical research and data-sharing.”

Further, the January 27, 2021 Executive Order 14008 “Tackling the Climate Crisis at Home and Abroad” includes the goal of doubling offshore wind by 2030 while creating good jobs and ensuring robust protection for our lands, waters, and biodiversity.

In the National Environmental Policy Act (“NEPA”), Congress declared “that 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.” In undertaking this EA, BOEM should ensure it is fulfilling that policy by taking efforts to:

- Maximizes the creation of quality, family-sustaining, union jobs;
- Expands domestic manufacturing along a robust domestic supply chain;
- Delivers community benefits with attention to improving access to low-income and Black, Brown, Indigenous, and People of Color (“BIPOC”); and
- Protects marine ecosystems by avoiding, minimizing, mitigating, and monitoring environmental impacts.

To achieve all of this in preparation for the EA for wind energy areas off the coast of Humboldt, and in regards to all offshore wind project development off U.S. shores, we appreciate your attention in analyzing the following matters:

Environmental Impacts

To comply with state and federal policies and achieve all necessary permits, all offshore wind energy must be developed in an environmentally responsible manner that avoids, minimizes, and mitigates impacts to ocean wildlife and habitat and traditional ocean uses, meaningfully engages stakeholders from the start, and uses the best available science and data to ensure science-based and stakeholder-informed decision making. This includes analysis of cumulative impacts and adaptive management strategies, obtaining all necessary and relevant data, and requires BOEM to identify all methodologies, and indicate when information is incomplete or unavailable, acknowledge scientific disagreement and data gaps, and evaluate intermediate adverse impacts based on approaches or methods generally accepted in the scientific community. Avoiding sensitive habitat areas, requiring strong measures to protect wildlife throughout each stage 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.

Socio-Economic Impacts

To achieve the Biden Administration’s vision for maximizing union job creation and to comply with NEPA’s requirement that federal projects “fulfill the social, economic, and other

requirements of present and future generations of Americans,” BOEM should consider leasing policies that maximize the creation of good jobs both in construction and operations and maintenance of projects, as well as along a robust domestic supply chain for offshore wind components.

In particular, BOEM should require or incentivize the use of high-road labor practices including Project Labor Agreements (PLAs), Community Benefits Agreement (CBAs); utilization of registered apprentices and other labor-management training programs, protection against worker misclassification and wage theft, neutrality agreements, targeted and local hire of disadvantaged workers and workers dislocated from the fossil fuel industry, and prevailing wage. In its proposed sale notice (PSN) for the sale of commercial wind energy leases on the Outer Continental Shelf (OCS) in the New York Bight, BOEM stated that high road labor standards, specific PLAs, may support the achievement of Outer Continental Shelf Lands Act factors “— including expeditious development and potentially more years of receipt of operating fees—by assuring labor stability.”²

Utilization of domestic content and growth of a domestic supply chain should be required or incentivized to maximize U.S. employment. A recent study by researchers at Princeton University found that increasing domestic content in renewable energy projects can create tens of thousands of American jobs without significantly increasing capital costs.³

When done right, offshore wind power will create thousands of high-quality, family-sustaining jobs in manufacturing, construction, operations and maintenance, and in the development of port facilities, transmission, and other associated infrastructure. We appreciate your work to prepare an EA so that we may realize the thousands of jobs and millions of dollars in economic benefits that will be provided by offshore wind.

Signed,



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² Department of the Interior, *Atlantic Wind Lease Sale 8 (ATLW-8) for Commercial Leasing for Wind Power on the Outer Continental Shelf in the New York Bight—Proposed Sale Notice*, Available Online: <https://www.boem.gov/sites/default/files/documents/renewable-energy/state-activities/86-FR-31524.pdf>

³ 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://www.dropbox.com/sh/ad9pzifo9w1a49u/AAC2milGD44MlwXo1Sk7EAgSa?dl=0&preview=Working_Paper-High_Road_Labor_and_Renewable_Energy-PUBLIC_RELEASE-4-13-21.pdf