



September 13, 2021

Rick Yarde, Regional Supervisor  
Bureau of Ocean Energy Management  
760 Paseo Camarillo, Suite 102  
Camarillo, CA 93010

**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**

Dear Mr Yarde,

Brightline Defense Project (“Brightline”) appreciates 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.

Brightline is an environmental justice organization dedicated to creating sustainable environments. In addition to analyzing renewable energy through the lens of equity, our nonprofit also empowers communities through air quality monitoring, job training, youth leadership, and much more. The Humboldt County OCS wind lease process has the potential to set strong community-centered precedent for California’s vast offshore wind resources. Brightline is not speaking on behalf of all impacted environmental justice communities and strongly encourages the Biden Administration and BOEM to pursue meaningful ongoing outreach to ensure these and other strategies that benefit underserved communities are informed by them.

Brightline offers the following comment regarding the EA of the Humboldt Wind Energy Areas.

*Environmental Justice Impacts of Offshore Wind Related Onshore Activities*

Offshore wind development in Wind Energy Areas will require port revitalizations to create capacity for turbine assembly due to the large size of offshore wind floating turbines and current port infrastructure.<sup>1</sup> In the revised EA for the Rhode Island and Massachusetts OCS wind areas and draft EA for the New York Bight OCS wind areas, onshore facilities and coastal impacts were deemed to have no impacts on environmental justice as the existing ports “would support proposed activities without any need for

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<sup>1</sup> *The California Offshore Wind Project: A Vision for Industry Growth*, American Jobs Project. February 2019. <http://americanjobsproject.us/wp/wp-content/uploads/2019/02/The-California-Offshore-Wind-Project.pdf>

expansion”.<sup>2</sup> The EA for future commercial wind leases off the coast of Humboldt County should include a thorough evaluation of environmental justice impacts to local communities due to the significant port improvements that will support floating offshore wind. Executive Order (“E.O.”) 14008 affirms the need for a strong equity view and directs federal agencies to “address the disproportionately high and adverse human health, environmental, climate-related and other cumulative impacts on disadvantaged communities”.<sup>3</sup>

Emissions from port infrastructure and manufacturing have the potential to disproportionately impact underserved communities that often live near port locations. Local air pollution related health issues can include premature death in people with heart or lung disease, irregular heartbeat, aggravated asthma, decreased lung function, and increased respiratory symptoms, such as irritation of the airways, coughing, or difficulty breathing. Underserved communities are also more likely unable to afford expensive air filtration and personal protection gear. BOEM should consider the human and local air quality impact of offshore wind leases impacts on environmental justice communities.

Additionally, the cultural significance of onshore and Humboldt Bay resources to local indigenous communities should be considered in the environmental justice evaluation of the EA and discussed in government-to-government consultations early and frequently.

Through this EA, Brightline would like to see strong precedents established for equity and environmental justice in the offshore wind development process. As Brightline has specifically studied the potential air quality and workforce development benefits of offshore wind in California,<sup>4</sup> we subsequently plan to continue to engage future environmental reviews and leasing processes for the Humboldt Wind Energy Areas.

Signed,



Eddie Ahn, Executive Director



Sarah Xu, Policy Associate

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<sup>2</sup> *Commercial and Research Wind Lease and Grant Issuance and Site Assessment Activities on the Atlantic Outer Continental Shelf of the New York Bight Draft Environmental Assessment*. August 2021.  
<https://www.boem.gov/sites/default/files/documents/renewable-energy/state-activities/NY-Bight-Draft-EA-2021.pdf>

<sup>3</sup> E.O. 14008 of Jan 27, 2021

<sup>4</sup> *California Offshore Wind: Winding Up for Economic Growth & Environmental Equity*, Brightline Defense (December 2020), <https://static1.squarespace.com/static/5f434962cbc7a227a863c879/t/5fd959830384a13720d3d61e/1608079766544/Brightline-OfshoreWind-Report-12-6-2020.pdf>.