



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

April 28, 2021

Ms. Amanda Lefton  
Director, Bureau of Ocean Energy Management  
45600 Woodland Road  
Sterling, VA 20166

**Comments on Notice of Intent to Prepare an Environmental Assessment for Wind Energy Areas in the New York Bight**

**Docket No. BOEM-2021-0021**

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) for the nearly 800,000 acres identified as Wind Energy Areas (WEAs) in the New York Bight. The expeditious assessment of the New York Bight WEAs is critical to meet New York and New Jersey’s ambitious offshore wind goals (9,000 megawatts and 7,500 megawatts respectively by 2035). It will also be key to meeting the Biden Administration's goal to deploy 30,000 megawatts of offshore wind by 2030.

Offshore wind projects in the New York Bight have the potential to create thousands of jobs and generate substantial economic activity. A recent study from Wood Mackenzie shows that building offshore wind projects in the New York Bight can support up to 25,000 development and construction jobs from 2022 to 2030, as well as an additional 7,000 jobs in communities supported by this development. The study also concludes the lease area also has the potential to support up to 4,000 operations and maintenance jobs annually, and approximately 2,000 community jobs in the following years. In addition to creating new jobs, leasing sites can generate substantial revenue. The most recent DOI offshore wind lease auction off the coast of New England brought in more than \$400 million in 2018, shattering the previous record of nearly \$42.5 million.

We thank you in advance for your review of the potential environmental consequences of site characterization activities and site assessment activities associated with issuing wind energy leases in the WEAs. 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.



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As the White House wrote in its recent offshore wind Fact Sheet:<sup>1</sup>

“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.

“...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.”

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 an environmental assessment of the new WEAs in the New York Bight, BOEM should ensure it is fulfilling that policy by taking efforts to create a high-road offshore wind industry that:

- 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 of the EA for WEAs in the New York Bight, and in regards to all offshore wind project development off U.S. shores, we appreciate your attention in analyzing the following matters:

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<sup>1</sup> 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/>



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### **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 mitigates, and monitors 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 state 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.

### **Economic Impacts**

To achieve the Biden Administration's vision for maximizing job creation and comply with NEPA's requirement that federal projects "fulfill the social, economic, and other requirements of present and future generations of Americans," the EA should analyze socioeconomic impacts related to activities associated with issuing wind energy leases in the WEAs.

BOEM should consider which auction format it will use to issue leases in the WEAs. Specifically, BOEM should implement a multi-factor bidding auction format, which allows consideration of non-monetary factors in awarding leases, including but not limited to "public benefits[and] compatibility with State and local needs." To the extent possible under its existing authority, as part of any lease auction, BOEM should implement requirements around use of domestic content; 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, local hire, and prevailing wage.

Plans to support utilization and growth of a domestic supply chain should be required and evaluated 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. Efforts should also be taken to avoid, minimize and mitigate impacts to environmental justice and BIPOC communities who have historically faced the worst impacts from industrialization and energy production. The EA should also evaluate the programs necessary for training and expanding the domestic workforce with an emphasis on ensuring opportunities for dislocated workers, as well as access and career pathways for environmental justice and BIPOC communities.



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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, informed by early-stakeholder input, and thorough and diligent socioeconomic and environmental review of this project, to support development of offshore wind in the New York Bight, so that we may realize the thousands of jobs and millions of dollars in economic benefits that will be provided by offshore wind.

Signed,

A handwritten signature in black ink, appearing to read "J Walsh", is positioned above the typed name.

Jason Walsh  
Executive Director  
BlueGreen Alliance