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Ms. Amanda Lefton
Director, Bureau of Ocean Energy Management
45600 Woodland Road
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**Notice of Intent to Prepare an Environmental Impact Statement for Ocean Wind, LLC's
Proposed Wind Energy Facility Offshore New Jersey**

On behalf of the BlueGreen Alliance, 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 Impact statement (“EIS or “Draft EIS”) for the Ocean Wind Construction and Operations Plan (“COP”) submitted by Ørsted. The expeditious permitting of this project is critical to meet New Jersey’s ambitious goal to deploy 7,500 megawatts of offshore wind by 2035.

The New Jersey Economic Development Authority projects the Ocean Wind project will create 1,500 permanent jobs and generate \$500 million a year in economic activity. This is in addition to the projection of approximately 1,000 construction jobs per year during the construction phase and about 69 full-time jobs at its operation and maintenance hub in Atlantic City for the 25-35 years lifespan of the project. The project will require a network of domestic suppliers and specialized marine transport vessels, and in some cases, an overhaul to the current ports and onshore facilities, all representing millions of dollars in investment in New Jersey and thousands of local jobs. Since the announcement of the Wind Port, EEW announced the investment in the Paulsboro marine Terminal to be used as a monopile manufacturing facility, which will create 500 high-paying jobs.

We thank you in advance for your review of this project’s socioeconomic and environmental impacts, and early consideration stakeholder input. A thorough federal analysis is necessary for this project 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 released in its recent offshore wind Fact Sheet:¹

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 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.”

We can and we must create a high-road offshore wind industry that maximizes domestic jobs content, delivers community benefits, expands manufacturing, and develops a robust local supply chain all with an attention to environmental justice impacts and improving access to low-income and Black, Brown, Indigenous, People of Color (“BIPOC”). As the National Environmental Policy Act (“NEPA”) is intended to ensure large-scale development projects “foster and promote the general welfare, 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,” union labor must be mobilized and expanded to ensure offshore wind jobs pay family-sustaining wages, benefits, and have workers protections, have advancement and career pathways, and maximize job creation.

To achieve all of this, in preparation of the DEIS for Ocean Wind, 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 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 DEIS should analyze socioeconomic impacts associated with Ørsted's plans for local hiring; union neutrality agreements; collective bargaining agreements; diversity, equity, and inclusion; and prevailing wage. The DEIS should also evaluate the programs necessary for training and domestic workforce with an emphasis on a just transition for fossil fuel workers, as well as health, safety, and alleviation of historic disparities for environmental justice and BIPOC communities. Related to these, plans to support a low-carbon domestic supply chain should be required and evaluated, both to maximize U.S. employment and to avoid, minimize and mitigate impacts to environmental justice and BIPOC communities have historically faced the worst impacts from industrialization and energy production.

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 and associated infrastructure. We appreciate your work to prepare a DEIS, informed by early-stakeholder input, and thorough and diligent socioeconomic and environmental review of this project, to support swift permitting of New Jersey's first large-scale offshore wind project, so that we may realize the thousands of jobs and millions of dollars in economic benefits that will be provided by the development of Ørsted's Ocean Wind.

Signed,

A handwritten signature in black ink, appearing to read 'Jason Walsh', written in a cursive style.

Jason Walsh
Executive Director
BlueGreen Alliance