



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

1/11/2022

Bureau of Ocean Energy Management
Office of Strategic Resources
760 Paseo Camarillo (Suite 102)
Camarillo, California 93010

Re: BOEM-2021-0044: Morro Bay Environmental Assessment Scoping

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 in regard to the Bureau of Ocean Energy Management's ("BOEM") preparation of an Environmental Assessment ("EA") under the National Environmental Policy Act ("NEPA") for the Morro Bay Wind Energy Area ("WEA") to help determine whether to move forward with a future commercial wind lease issuance.

The BlueGreen Alliance unites labor unions and environmental organizations to solve today's environmental challenges in a way that creates and maintains quality jobs and builds a clean, thriving, and equitable economy. Offshore wind energy presents a unique and integral opportunity to accomplish this mission, if developed in alignment with the Biden Administration's commitments described by the White House in its offshore wind Fact Sheet¹ early last year:

"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

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/>

2. Investing in American infrastructure to strengthen the domestic supply chain and deploy offshore wind energy
3. Supporting critical research and data-sharing.”

We applaud these efforts that are continuously demonstrated by your agency’s ongoing action to advance offshore wind energy in America to meet national security and energy needs, as well as clean energy goals that states have set from coast to coast.

In California last September, legislation was enacted that directs state regulators to set a target for offshore wind energy and establish a coordinated plan for achieving it.² The new law recognizes the integral role that offshore wind energy will have in meeting the clean energy goals established by the 100 Percent Clean Energy Act of 2018, as noted in a 2021 Joint Agency Report³ released early last year to review the state’s progress on the goals and assess various pathways to achieve the target. Energy portfolio models in the report point to a gap of 145 GW of clean energy capacity and a need for at least 10 GW of that gap to be fulfilled by offshore wind energy development.

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, thorough and comprehensive federal analysis is needed.

California has been a leader in charting the path for climate solutions, but Californians are still experiencing the devastating impacts of climate change first hand. The last several years have seen record-breaking wildlife seasons and some of the largest wildfires ever recorded. The August Complex Fire in August 2020 burned over one million acres, taking down nearly a hundred structures. Last year the Dixie fire nearly matched that, taking down nearly a million acres and well over a thousand structures. The need for solutions that cater to the environmental as well as the social impacts of the climate crisis have never been more clear. Offshore wind can do both, and it must. And as required by NEPA, both the environmental and social impacts of offshore wind energy development must be analyzed in the EA that is the topic of the comments.

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 analysis of possible commercial wind energy leasing in the Morro Bay WEA, 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 displaced energy workers as well as low-income and Black, Brown, Indigenous, and People of Color (“BIPOC”); and

² Energy: offshore wind generation, Cal. Assemb. B. 525 (2021-2022).

³ Cal. Energy Comm’n et al., 2021 SB 100 Joint Agency Report (Mar. 2021).

- Protects marine ecosystems by avoiding, minimizing, mitigating, and monitoring environmental impacts.

To achieve all of this in its analysis of possible commercial wind energy leasing in the Morro Bay Call Area Extensions, 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 comply with NEPA’s requirement that federal projects “fulfill the social, economic, and other requirements of present and future generations of Americans,” any leasing in the Morro Bay Call Area Extensions should include requirements around high road labor practices and use of domestic content, and analyses should include socioeconomic assessment of implementing these standards. High road labor practices include: Project Labor Agreements (PLAs), Labor Peace Agreements (LPAs) and organizing neutrality, Community Benefits Agreement (CBAs); utilization of registered apprentices and other federal and/or state approved 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, specifically 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.”⁴ A thorough environmental assessment under NEPA is one that contains the socioeconomic implications for utilizing labor standards, as well as the implications of alternatives. This type of assessment is critical at these earliest stages, before an auction is held and commercial lease issued, and before developers have begun developing Construction and Operation plans for building offshore wind projects.

⁴ 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>

Plans to support utilization and growth of a domestic supply chain should also be required and analyzed in NEPA reviews to maximize U.S. employment that would result from any wind energy leasing in the extended Morro Bay Call Areas. 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.⁵ BOEM actions should also take into consideration the programs necessary for training and expanding the domestic workforce with an emphasis on ensuring opportunities for displaced energy workers, as well as fostering equitable access to career pathways in the industry.

In conclusion, 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 for possible offshore wind energy leasing in the Morro Bay Call Area Extensions, informed by early-stakeholder input, and to conduct a diligent socioeconomic review of any future projects 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', written in a cursive style.

Jason Walsh
Executive Director
BlueGreen Alliance

⁵ 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