



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

February 12, 2024

Director Liz Klein
U.S. Bureau of Ocean Energy Management
U.S. Department of the Interior
1849 C Street, N.W.
Washington, D.C. 20240
Submitted Electronically

Re: BOEM-2023-0034 Draft Environmental Assessment for Commercial Wind Lease Issuance and Site Assessment Activities on the Atlantic Outer Continental Shelf Offshore Delaware, Maryland, and Virginia

Dear Director Klein:

On behalf of the BlueGreen Alliance (BGA), our partners, and the millions of members and supporters they represent, we thank the U.S. Bureau of Ocean Energy Management (BOEM) for the opportunity to comment on the draft environmental assessment (EA) for the Central Atlantic.

The mission of BGA is to unite labor unions and environmental organizations to solve today's environmental challenges in a way that creates and maintains quality jobs and builds a clean, prosperous, and equitable economy. Offshore wind is a vital clean energy solution that presents a once-in-a-generation opportunity to advance this mission if projects are developed in an equitable and environmentally responsible manner, with high-road labor standards and attention to environmental justice. Offshore wind projects have the potential to lift up the working class with family-sustaining union jobs, deliver benefits to communities hardest hit by climate change and economic inequality, and protect wildlife and critical habitats at every stage of development. As BOEM advances projects through the National Environmental Policy Act (NEPA) process, we urge them to conduct robust analysis of all these associated environmental and socioeconomic impacts.

As BOEM works to develop the final EA, we urge the agency to ensure that offshore wind equitably achieves the maximum beneficial impacts by including robust assessment of whether projects meet the following standards:

- Maximize the creation of quality, high-paying union jobs over projects' lifetimes;
- Expand domestic manufacturing along robust domestic, regional, and local supply chains;
- Deliver community benefits with attention to improving access to disadvantaged communities;

- Protect fisheries, wildlife, and marine ecosystems by utilizing data sharing, the best available science and data, and adaptive management strategies to avoid, minimize, mitigate, and monitor environmental impacts; and
- Are guided by robust and inclusive stakeholder engagement, including labor organizations, Tribal nations, historically underrepresented or disadvantaged communities, low-wealth communities, communities of color, and impacted ocean users.

BOEM should support this approach to equitable, high-road, environmentally responsible development by ensuring each developer negotiates a project labor agreement (PLA) for all construction, by ensuring benefits—including but not limited to high-quality jobs—are being delivered to disadvantaged communities, and by utilizing best management practices to protect marine resources and the environment.

As BOEM explained in the decision memorandum documenting the rationale for certain provisions of the New York Bight Final Sales Notice, PLAs promote safety and the expansion of a workforce of well-trained personnel, which is particularly important since operations on the outer continental shelf (OCS) can be hazardous and complex. In addition to PLAs supporting the facilitation of both on-the-job training and training opportunities for new apprentices, BOEM explains that “PLAs typically contain provisions directly addressing safety, along with requiring training as both the substantive aspects of a job and the management of safety aspects on the job” and “promote the standardization of training and safety protocols for offshore work.”ⁱ BOEM concluded that “the greater certainty provided by PLAs’ no-strike components and established dispute resolution procedures may facilitate the timely completion of large offshore construction projects,” and help ensure they meet statutory requirements for “expeditious and orderly development.”ⁱⁱ

In the following sections, we make recommendations for strengthening the EA in order to best achieve the above standards which we believe are aligned with state and federal statute governing offshore wind development. To summarize, we strongly urge BOEM to provide greater detail related to:

- Potential employment benefits, including job training, job-quality and accessibility;
- Strategies to avoid, mitigate, minimize, and monitor adverse impacts to communities, wildlife, and the environment;
- Data transparency regarding community engagement and oversight of monitoring activities related to pollutants associated with development; and
- Robust stakeholder engagement that includes ocean-users, communities and all impacted Tribes within the geography that reflects their historical presence in the regions impacted by offshore wind development.

The EA would benefit from a greater analysis of specific workforce development needs, plans, and collaborations. Many unions run high-quality, registered workforce development programs that train participants in various trades that have transferable skills to the offshore wind industry.

However, for a U.S. workforce to access opportunities in offshore wind, developers must share information about the specific skills training and certifications required as well as information about employment opportunities. This information, along with specific commitments to develop durable pathways for minority contractors and workers into training and employment is invaluable.

These recommendations are consistent with federal policy, as explained below, and are elaborated on in the following sections.

High-road, Equitable, Environmentally Responsible Development

Outer Continental Shelf Lands Act

BGA believes that our standards for high-road, equitable, and environmentally responsible development are consistent with federal statute. In Section 8 of the Outer Continental Shelf Lands Act (OCSLA), Congress declared that it is the authority of the Secretary of the Interior (delegated to BOEM) to “grant a lease, easement, or right-of-way” for activities that “produce or support production, transportation, or transmission of energy from sources other than oil and gas” in a manner that provides for:

- “(A) Safety;
- (B) Protection of the environment;
- (C) Prevention of waste;
- (D) Conservation of the natural resources of the Outer Continental Shelf;
- (E) Coordination with relevant Federal agencies;
- (F) Protection of national security interests of the United States;
- (G) Protection of correlative rights in the Outer Continental Shelf;
- (H) A fair return to the United States;
- (I) Prevention of interferences with reasonable uses of the exclusive economic zone, the high seas, and the territorial seas;
- (J) Consideration of –
 - a. The location of, and any schedule relating to, a lease, easement or right-of-way for an area of the Outer Continental Shelf; and
 - b. Any other use of the sea or seabed, including use for a fishery, a sea lane, a potential site of a deep-water port, or navigation;
- (K) Public notice and comment on any proposal submitted for a lease, easement or right-of-way under this subsection; and
- (L) Oversight, inspection, research monitoring, and enforcement related to a lease, easement, or right-of-way under this subsection.”ⁱⁱⁱ

Our standards touch on many of these imperatives including safety; protection of the environment; conservation of natural resources; protection of national security; fair return to the United States; consideration of other uses; and oversight, inspection, and resource monitoring.

Environmentally responsible development, robust stakeholder engagement, equitable distribution of benefits, and attention to quality job creation domestically are all foundational to OCSLA requirements.

In addition to the authority granted to BOEM to facilitate energy development on the OCS, the president has authority to direct requirements on leases of the OCS and precedent exists for the president to do so. Current BOEM leases include terms mandated by presidential Executive Order 11246, which prohibits employment discrimination and establishes affirmative action requirements for nonexempt federal contractors and subcontractors.^{iv} Article II, § 1 of the U.S. Constitution provides that “executive power shall be vested in” the president. Such power gives the president the right—in the absence of an express congressional declaration to the contrary—to control the terms upon which public lands or property may be sold, leased, or used by private individuals or entities.^v

Executive Orders on Domestic Manufacturing, Environmental Justice, and Union Labor

President Biden has reinforced in various executive orders that it is the policy of the federal government to pursue solutions to the climate crisis with attention to union labor, domestic manufacturing, environmental justice, and protection of natural resources. The announcement of the national offshore wind target to deploy 30 gigawatts (GW) of offshore wind by 2030 further underscored this approach. The White House fact sheet containing that announcement declared:

“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.”^{vi}

In Executive Order 14008, *Tackling the Climate Crisis at Home and Abroad*, issued January 27, 2021, President Biden stated that it is the policy of the United States:

“to organize and deploy the full capacity of its agencies to combat the climate crisis to implement a Government-wide approach that reduces climate pollution in every sector of the economy; increases resilience to the impacts of climate change; protects public health; conserves our lands, waters, and biodiversity; delivers environmental justice; and spurs well-paying union jobs and economic growth, especially through innovation, commercialization, and deployment of clean energy technologies and infrastructure.”

This executive order further emphasizes that “[t]his Nation needs millions of construction, manufacturing, engineering, and skilled-trades workers to build a new American infrastructure and clean energy economy.”^{vii} President Biden further states, “Agencies...shall seek to increase the Federal Government’s resilience against supply chain disruptions. Such disruptions put the Nation’s manufacturing sector at risk, as well as consumer access to critical goods and services.” Additionally, President Biden directed all agencies to “adhere to the requirements of the Made in America Laws in making clean energy, energy efficiency, and clean energy procurement decisions” consistent with Executive Order 14005, *Ensuring the Future Is Made in All of America by All of America's Workers*.^{viii}

President Biden has also emphasized the need to maximize utilization of domestic content as we advance climate and clean energy solutions in order to strengthen U.S. manufacturing. President Biden’s *Executive Order on America’s Supply Chains*, issued February 24, 2021, states, “[t]he United States needs resilient, diverse, and secure supply chains to ensure our economic prosperity and national security.”^{ix} It continues to say, “resilient American supply chains will revitalize and rebuild domestic manufacturing capacity, maintain America’s competitive edge in research and development, and create well-paying jobs. They will also support small businesses, promote prosperity, advance the fight against climate change, and encourage economic growth in communities of color and economically distressed areas.”

Utilizing Domestic Content Maximizes Benefits and Supports National Security

It is evident that utilization of domestic content in offshore wind projects is imperative for reaching our federal goals. The March 2022 offshore wind energy supply chain report by the National Renewable Energy Laboratory (NREL) states that supply chain constraints caused by global bottlenecks are one of the greatest risks for achieving the national offshore wind target.^x The modeling in the report also shows that average and maximum job creation utilizing 25% domestic content versus 100% domestic content in offshore wind projects results in a difference of approximately 30,000-40,000 jobs from 2023-2030.^{xi} In addition, across renewables, even a modest increase in manufacturing produces an additional 45,000 good manufacturing jobs per year and an additional \$5 billion in wages through the 2020s, as the United States continues greening its electricity grid.^{xii} Further, domestic content requirements are unlikely to influence wind power capital costs.^{xiii} And, as emphasized in a number of President Biden’s executive orders, national security is also protected by utilizing domestic content.

Recent global events have made it abundantly clear that our national security is strongly tied to our energy security, to which domestic manufacturing plays a critical role. The U.S. Department of

Energy (DOE) and the North American Electric Reliability Corporation (NERC), jointly-commissioned a report assessing risks to the U.S. electricity generation and distribution infrastructure. The summary of the report observed that the “bulk power system is dependent on long supply chains, often with non-domestic sources and links” and determined that the “increased reliance on foreign manufacturers, with critical components and essential spare parts manufactured abroad (e.g. HV transformers)” means the “supply chain itself represents an important potential vulnerability.”^{xiv} The report recommends that “efforts should be considered to bring more of the supply chain and manufacturing base for these critical assets back to North America.”^{xv}

Strengthening the nation’s supply chains can result in environmental benefits as well. Energy intensive manufacturers in the United States are relatively clean compared to competitors. As one example, “[s]teel exporters to the U.S. emit 50-100+% more CO₂ emissions per ton than U.S. producers on average.”^{xvi} Use of domestic content can also reduce shipping distance, and thus emissions resulting from long-distance maritime transportation. The International Maritime Organization (IMO) estimates that maritime shipping generated 1 billion tons of greenhouse gases per year from 2007-2012. Another study estimates that maritime shipping emissions are forecasted to rise between 35% and 210% by 2050.^{xvii}

Supporting U.S. manufacturing also has equity implications. Data shows that decline in U.S. manufacturing has been devastating to the middle-class, especially for Black and Hispanic workers and other workers of color who disproportionately do not hold college degrees, and who experience discrimination limiting access to better-paying jobs.^{xviii} Manufacturing wages are substantially larger than in non-manufacturing industries for median-wage, non-college-educated employees, with Black workers in manufacturing earning 17.9% more; Hispanic workers earning 17.8% more, Asian American Pacific Islander (AAPI) earning 14.3% more; and white workers earning 29% more.^{xix}

Union Labor Further Increases Benefits

Across sectors, the U.S. Department of Labor (DOL) reports that unions raise wages for all workers and the Bureau of Labor Statistics reports that non-union workers earn just 83% of what unionized workers earn.^{xx,xxi} It’s no wonder that union approval is at its highest since 1965, with 68% approving of labor unions and even higher numbers of support specifically among young people and people of color.^{xxii} The White House report on “Worker Organizing and Empowerment” says that support for a union increases to 74% for workers aged 18 to 24, 75% for Hispanic workers, 80% for Black workers, and 82% for Black women workers.^{xxiii} The report also contains guidance for how unions advance equity for underserved populations, including greater transparency around pay and higher wages, greater job security, and increased access to career pathways for women and workers of color.^{xxiv} PLAs are a proven way to ensure workers in the construction sector have access to the benefits and protections of unions.

Moreover, the primary consideration for BOEM to ensure developers negotiate PLAs is BOEM’s

proprietary interest in ensuring orderly and efficient operations. President Biden’s Executive Order 14063, *Use of Project Labor Agreements for Federal Construction Projects*, issued February 4, 2022 underscores the benefits of utilizing PLAs for large-scale construction projects. Specifically, it states:

“Project labor agreements...provide structure and stability to large-scale construction projects...[and] avoid labor-related disruptions by using dispute-resolution processes to resolve worksite disputes and by prohibiting work stoppages, including strikes and lockouts. They secure the commitment of all stakeholders on a construction site that the Project will proceed efficiently without unnecessary interruptions.”^{xxv}

PLA’s have been demonstrated to reduce project costs for developers, save public funds in the long run, and produce increased economic benefits for the local community.^{xxvi} In addition, PLAs often lead to safer working conditions as a result of a more skilled workforce that union training programs provide.^{xxvii} A 2021 Canadian study found that unionization in institutional, commercial, and industrial construction, maintenance, and repair work was associated with a 25% lower lost-time injury rate, 23% lower incidence of musculoskeletal lost-time injury claims, and 16% lower incidence of critical lost time injury claims.^{xxviii} Data also suggests that accidents in the construction industry are more common in states with low-road contractors.^{xxix} Union firms are also 16% less likely to report difficulty in filling open positions, 13% less likely to fail in retaining skilled workers and 21% less likely to report project delays due to retention issues,^{xxx} which is key to timely and efficient deployment during construction labor shortages. Because PLAs often include provisions around apprenticeship utilization and recruitment of women, minorities, veterans, and other underrepresented workers, they also contribute to more equitable career pathways for a diverse workforce. These data points are important to consider as BOEM undergoes the NEPA review process.

Recommendations for the Final Environmental Assessment

National Environmental Policy Act (NEPA)

As part of the NEPA process, BOEM is required to review environmental, social, and economic data related to the proposed project. In NEPA, Congress declared: “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.”

To create these conditions, it is imperative that BOEM plays a role in ensuring that the positive impacts of offshore wind projects are maximized and delivered equitably while using the best available science and data to establish measures to avoid, minimize, mitigate, and monitor environmental and wildlife impacts as well as their social implications. This will require that all offshore wind lease contracts and permitting activities ensure the application of high-road employment practices, community benefits agreements, best management practices, and other

means to ensure that projects are developed in an environmentally responsible manner and that benefits are maximized and equitable distributed.

We believe that this depth of assessment is aligned with NEPA guidance. BOEM's July 2017 study, *Evaluating Benefits of Offshore Wind Energy Projects in NEPA*, states: "NEPA analyses (Environmental Assessments [EAs] or Environmental Impact Statements [EISs]) typically focus on adverse impacts to the environment. **However, NEPA analyses also need to include environmental and socioeconomic benefits analyses.**"^{xxxii} The study also states that benefits analysis should consider electricity system benefits, including injecting power into the existing grid; average retail cost of power; evaluating system benefits from offshore wind energy production; environmental benefits over key periods of a project's life-cycle, including water, wetlands, biological and cultural resources, recreation and tourism, fisheries, safety, soils, land use, air quality, noise, and raw materials used for construction; **and socioeconomic considerations.** The study describes that although NEPA does not specifically require a socioeconomic assessment, it does require an integrated use of the social sciences to assess impacts on the human environment.

These requirements, paired with President Biden's commitments to union labor, environmental justice, and the protection of natural resources should result in a thorough analysis that ensures communities, workers, and Tribes realize project benefits while protecting communities, wildlife, and the environment from adverse impacts. Given this scope, we urge BOEM to consider the following recommendations to further clarify environmental and socioeconomic impacts in the final EA.

Creating accessible, high-quality union jobs

The DOL's Good Jobs Initiative highlights equity and job quality principles and metrics to be used in federal grant making processes that should be strongly considered by BOEM for use in the EA and future environmental impact statement (EIS). The equity and job quality principles include **proactively addressing racial equity; reducing barriers to opportunity; supporting the creation of good-paying jobs with the free and fair choice to join a union; providing opportunities for all workers—including underrepresented workers—to be trained and placed in good-paying jobs; utilization of PLAs and/or local hire provisions, training, and placement programs for underrepresented workers; and adopting an equity and inclusion program/plan focused on procurement, material sourcing, construction, inspection, and hiring.**^{xxxiii} These are great examples of metrics related to equity and job quality and should be considered for evaluating the job creation benefits of offshore wind development.

Specifically, the EA should provide assessment of the following categories related to jobs and job training:

Manufacturing

Maximizing the creation of manufacturing jobs across a domestic offshore wind supply chain is key for this industry to fulfill its economic benefit potential. As mentioned earlier in the report, supply chain constraints caused by global bottlenecks are one of the greatest risks for achieving 30 GW of offshore wind by 2030.^{xxxiii} According to NREL, the average and maximum job creation utilizing 25% domestic content versus 100% domestic content in offshore wind projects results in a difference of approximately 30,000-40,000 jobs from 2023-2030.

The EA and future EIS should **specify job categories and job numbers per category resulting from each domestically manufactured component, as well as how these numbers are accounted for in the total number of direct, indirect, and induced jobs, gross state product, and anticipated personal income.** The analysis should also include an **assessment of education and certifications necessary to access each job category, the training, average wages, hours, career advancement, physical demands, and safety information, as well as any commitments the company has made to ensure workers have the free and fair choice to join a union, such as through a union neutrality agreement.** This information is essential for the U.S. workforce to have equitable access to employment opportunities.

Additional information regarding material quality, standards, and certifications should also be included along with other information germane to securing a supplier contract with the offshore wind developer. This information is critical for U.S. companies to access opportunities, especially minority, women, and veteran owned businesses. Finally, the EA and future EIS should also contain information about the manufacture of offshore wind energy components that did not take place in the United States, in order to understand the full breadth of employment benefits that could be expected as a domestic offshore wind supply chain matures.

Operations and Maintenance (O&M)

Similarly, for O&M job impacts, the assessment should specify O&M job categories, job numbers in each category, and how job numbers are accounted for in the total number of direct, indirect, and induced jobs; gross state product; and anticipated personal income. It should also include an **assessment of education and certifications necessary** to access those jobs, training, average wages, career advancement, hours, physical demands, and safety information, as well as any commitments the company has made to ensure workers have the free and fair choice to join a union, such as through a union neutrality agreement. **The assessment should indicate the number of jobs that, if any, require specialized experience that would prohibit workers in the United States from accessing those jobs, and the specific experience and training that is required. When it comes to training, the assessment should specify whether workers will need to go overseas to receive training, and the duration of that training.** Given the size of offshore wind projects, BOEM should be sure to specify jobs categories related to the operation and maintenance of every aspect of offshore wind development, including the turbines themselves, cables, and onshore and offshore substations. **Any apprenticeship utilization should also be documented, and the types of apprenticeships to ensure that they are DOL-certified.**

Construction

The EA should include all relevant construction jobs, including any construction jobs anticipated to prepare the port that is selected for assembly, preparation of the cable route and interconnection, and the construction or site preparation of any manufacturing facilities. Consistent with the previous two categories, BOEM should specify job categories, job numbers in each category, and how job numbers are accounted for in the total number of direct, indirect, and induced jobs; gross state product; and anticipated personal income. The EA and future EIS should also include an assessment of education and certifications necessary to access each job category, the training, average wages, hours, career advancement, physical demands, and safety information. If any construction jobs require specialized experience that prohibit workers in the United States from accessing these jobs, that should also be detailed, including the number of jobs, as well as the training and experience required. The EA should also specify whether workers will need to go overseas to receive training, and the duration of that training.

Training, Demographics, and Employment Benefits

BOEM should be sure to include detailed information regarding training. One of the main mechanisms for building career pathways is through registered apprenticeship, pre-apprenticeship, and other union-affiliated training programs. Pre-apprenticeship programs aim to ensure that workers can qualify for entry into an apprenticeship program and have the skills and support they need to succeed. These programs are generally designed to target certain populations or demographics such as low-income workers, workers of color, women, and other marginalized communities. Additionally, many unions offer training throughout a member's career to enable them to stay up to date with changes in technology. The most successful pre-apprenticeship programs are those affiliated with registered apprenticeships or other contractually agreed on-the-job training programs.

Apprenticeships are registered through a state apprenticeship agency or through the DOL. Registered apprenticeships are paid positions that combine on-the-job training with classroom instruction in a trade. Construction unions operate robust registered apprenticeship programs while industrial unions work with employers on joint labor management training programs that also provide a combination of classroom and on-the-job skills training. When these programs are paired with recruitment strategies such as partnering with a community group to provide information about workforce and training opportunities and providing wrap-around services, the benefits can be even greater. Many examples of programs providing such services can be found in the November 2022 workforce development White House fact sheet.^{xxxiv}

BOEM should also include any language access needs for the local community that may be present in order to access jobs benefits. The NEPA guidance study does not require demographics related to language or education, but BOEM should consider these and other qualities that should be taken into account to ensure jobs are accessible to a diverse workforce. Any agreements that project developers have made to increase access—be it to jobs in manufacturing, operations and

maintenance, construction, or otherwise—should be detailed to increase transparency and the local community’s ability to access these resources and benefits.

Ensuring Environmental Justice

The Biden administration has made historic commitments to environmental justice, including the goal for 40% of the overall benefits of federal investments to flow to disadvantaged communities. While benefits from offshore wind projects are not explicitly considered in Justice40, generally, any federal program that addresses climate change, clean energy and energy efficiency, clean transit, affordable, and sustainable housing, training and workforce development, legacy pollution, and clean water infrastructure is considered a J40 covered program. BOEM should do its due diligence to ensure that communities and Tribes receive the maximum possible benefits.

BOEM should be sure to detail all information related to air and water quality associated with manufacturing, port activities, construction, and ongoing operations and maintenance. It should also include any community consultation related to adverse impacts and methods for continued community engagement around the oversight, monitoring, and structuring of mitigation plans including adaptive management strategies. BOEM should ensure that offshore wind developers conduct appropriate benthic surveys and obtain samples for all cable routes and other activities that may be impacted by existing contamination from urban and storm runoff, industry, or historic use of the site. Pre-construction, construction, and post-construction monitoring should be conducted, especially in areas of known vulnerability such as those adjacent to known sources of contaminants and near environmental justice communities. BOEM should include any requests made by the community that are publicly available, such as, but not limited to, requests for community benefits agreements and community governance of offshore wind projects.

BOEM should also ensure that all impacted Tribes are properly consulted, including state-recognized Tribes, and non-federally recognized Tribes in a geographic analysis area that is representative of their historical presence in the region. Robust consultation with Tribes should be extended to relevant activities that take place out of the state or region. Ensuring the consultation of Tribes and ensuring the preservation of cultural resources is critical for advancing the environmental justice goals set by the Biden-Harris Administration.

Environmental Protection

Environmental protection is a key requirement under the OCSLA and NEPA, and rigorous plans must be in place for offshore wind projects to comply with various state and federal statutes that projects are subject to. Offshore wind energy must be developed in an environmentally responsible manner that avoids, minimizes, and mitigates impacts to marine life and ocean users, 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 identifying all methodologies and indicating when information is incomplete or unavailable, acknowledging scientific disagreement and data gaps, and evaluating 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. The combination of alternatives should be chosen that ensures communities, wildlife, and the environment are protected while maximizing the creation of quality, high-paying jobs, and economic benefits.

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 while also avoiding, minimizing, and mitigating environmental impacts. Thank you for considering how BOEM might further strengthen its role in ensuring that offshore wind energy is developed responsibly, with attention to equity, maximizing quality jobs and career pathways, and protecting the environment with these additions to the EA. We appreciate your effort to solicit stakeholder input to inform the offshore wind energy leasing process.

Signed,

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

Jason Walsh
Executive Director
BlueGreen Alliance

ⁱ U.S. Department of the Interior (DOI), New York Bight Final Lease Sale Decision Memorandum, Dec. 2021. <https://www.boem.gov/sites/default/files/documents/renewable-energy/state-activities/ATLW-8-NY-Bight-Final-Lease-Sale-Decision-Memorandum.pdf>

ⁱⁱ U.S. Code, § 1332 - Congressional declaration of policy.
<https://www.law.cornell.edu/uscode/text/43/1332>

ⁱⁱⁱ U.S. Code, § 1337 - Leases, easements, and rights-of-way on the outer Continental Shelf.
<https://www.law.cornell.edu/uscode/text/43/1337>

^{iv} U.S. Department of Labor (DOL), Executive Order 11246 – Equal Employment Opportunity, Sept. 24, 1965. <https://www.dol.gov/agencies/ofccp/executive-order-11246/as-amended>

^v Casetext, United States v. Midwest Oil Co., Feb. 23, 1915. <https://casetext.com/case/united-states-v-midwest-oil-co>

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

^{vii} White House, Executive Order on Tackling the Climate Crisis at Home and Abroad, Jan. 27, 2021. <https://www.whitehouse.gov/briefing-room/presidential-actions/2021/01/27/executive-order-on-tackling-the-climate-crisis-at-home-and-abroad/>

^{viii} White House, Executive Order on Ensuring the Future Is Made in All of America by All of America's Workers, Jan. 25, 2021. <https://www.whitehouse.gov/briefing-room/presidential-actions/2021/01/25/executive-order-on-ensuring-the-future-is-made-in-all-of-america-by-all-of-americas-workers/>

^{ix} White House, Executive Order on America's Supply Chains, February 24, 2021. <https://www.whitehouse.gov/briefing-room/presidential-actions/2021/02/24/executive-order-on-americas-supply-chains/>

^x NREL, The Demand for a Domestic Offshore Wind Energy Supply Chain, January 2022. <https://www.nrel.gov/docs/fy22osti/81602.pdf>

^{xi} *ibid.*

^{xii} Princeton University, Working Paper: Influence of High Road Labor Policies and Practices on Renewable Energy Costs, Decarbonization Pathways, and Labor Outcomes, April 13, 2021. https://netzeroamerica.princeton.edu/img/Working_Paper-High_Road_Labor_and_Renewable_Energy-PUBLIC_RELEASE-4-13-21.pdf

^{xiii} *ibid.*

^{xiv} North American Electric Reliability Corporation, High-Impact, Low-Frequency Event Risk Impact to the North American Bulk Power System, June 2010. <https://www.energy.gov/ceser/downloads/high-impact-low-frequency-risk-north-american-bulk-power-system-june-2010>.

^{xv} *ibid.*

^{xvi} CUR Consulting, Leveraging a Carbon Advantage: Impacts of a Border Carbon Adjustment and Carbon Fee on the US Steel Industry, 2021. <https://clcouncil.org/reports/leveraging-a-carbon-advantage.pdf?v1>

^{xvii} Stockholm Environment Institute Calculating Maritime Shipping Emissions Per Traded Commodity, April 2019. <https://www.sei.org/publications/shipping-emissions-per-commodity/>

^{xviii} Economic Policy Institute (EPI), Botched policy responses to globalization have decimated manufacturing employment with often overlooked costs for Black, Brown, and other workers of color, January 31, 2022. <https://files.epi.org/uploads/239189.pdf>

^{xix} *ibid.*

^{xx} DOL, The Union Advantage. www.dol.gov/general/workcenter/union-advantage

^{xxi} Bureau of Labor Statistics (BLS), Union Members, 2021. www.bls.gov/news.release/pdf/union2.pdf

^{xxii} The White House, White House Task Force on Worker Organizing and Empowerment Report, February 2022. www.whitehouse.gov/wp-content/uploads/2022/02/White-House-Task-Force-on-Worker-Organizing-and-Empowerment-Report.pdf

^{xxiii} *ibid.*

^{xxiv} DOL, How the Task Force is advancing equity across underserved communities by supporting worker organizing and collective bargaining. www.dol.gov/sites/dolgov/files/general/labortaskforce/docs/508_union-fs-1.pdf

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