



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

10/4/21

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Comments on Notice of Intent to Prepare an Environmental Impact Statement Proposed Sunrise Wind Farm Project on the Northeast Atlantic Outer Continental Shelf

Docket No. BOEM–2021–0052

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”) as part of its review of a construction and operations plan submitted by Sunrise Wind LLC and provided project information. The expeditious permitting of this project is critical to meet New York’s ambitious goal to deploy 9,000 megawatts by 2035. It also is key to meeting the Biden Administration’s goal to deploy 30,000 megawatts of offshore wind by 2030.

The project is expected to have a significant economic impact on New York. 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 York and thousands of local jobs. Orsted and Eversource have committed to directly invest more than \$408 million in New York to deploy the Sunrise Wind project, which is estimated to generate up to 800 direct jobs through the project’s construction. The project will also create an Operations and Maintenance Hub in Port Jefferson, supporting approximately 100 permanent, full-time jobs over the 25-year lifespan of the project. Additionally, there is a committed \$10 million in seed funding to create a National Offshore Wind Training Center in Suffolk County.

We thank you in advance for your review of this project’s socioeconomic and environmental impacts, and early consideration of stakeholder input. 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. As the White House wrote 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.”

Further, the January 27, 2021, Executive Order 14008 “Tackling the Climate Crisis at Home and Abroad,” includes the goal of doubling offshore wind by 2030 while creating good jobs and ensuring robust protection for our lands, waters, and biodiversity.

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 DEIS for the Sunrise Wind project, 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
- Protects marine ecosystems by avoiding, minimizing, mitigating and monitoring environmental impacts.

To achieve all of this in preparation of the DEIS for the Sunrise Wind project, 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.

Socio-Economic Impacts

To achieve the Biden Administration’s vision for maximizing union job creation and to 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 include a robust analysis of socioeconomic impacts associated with the project.

In particular, BOEM’s analysis of socioeconomic impacts should include consideration of Orsted and Eversource’s commitments 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. 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, specific 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.”²

Plans to support utilization and growth of a domestic supply chain should be analyzed and evaluated to maximize U.S. employment for the projected life cycle of the project. 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.³ The DEIS should also evaluate 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.

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 a DEIS, informed by early-stakeholder input, and to conduct a diligent socioeconomic review of

² 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>

³ 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

this project 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 'Jason Walsh', with a stylized flourish at the end.

Jason Walsh
Executive Director
BlueGreen Alliance