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Re: BOEM Initiates Environmental Assessment for Offshore Wind in the Gulf of Mexico

The American Clean Power Association ("ACP") welcomes the opportunity to provide comments on the U.S. Bureau of Ocean Energy Management's ("BOEM") notice to prepare an Environmental Assessment ("EA") for Offshore Wind in the Gulf of Mexico ("GoM" or "Gulf").[1] We support BOEM's intent to further the early actions and progress it has taken in the GoM area to meet the Biden Administration's national goal to deploy clean energy and combat the threat of climate change. BOEM should continue to expeditiously and strategically advance efforts to hold a competitive lease sale(s) by the end of 2022, while also considering longer and regular lease auctions aligned with the Biden Administration's target to deploy 30 GW of offshore wind in the United States by 2030 and unlocking a pathway to 110 GW by 2050.

I. Importance of Offshore Wind in the Gulf

The Gulf of Mexico has a vast offshore wind energy resource with a technical potential of more than 500 GW of clean energy generation from offshore wind. Once tapped, this resource will create millions in revenue for federal, state, and local governments and help create thousands of jobs. Our recent report estimates that a national leasing program between 23 and 40 GW of new offshore wind projects is projected to generate upwards of $2.7 billion USD in lease sale revenue with an additional approximately $1 – 2 billion in rents and operating fees as projects are developed, constructed, and operated. More importantly, these leases and associated projects will strengthen the domestic workforce, providing jobs in construction (73,000 – 128,000 jobs), operations, and maintenance (28,000 – 48,000 jobs) for these projects.[2] A

[1] https://downloads.regulations.gov/BOEM-2021-0092-0001/content.pdf
[2] https://cleanpower.org/wp-content/uploads/2021/12/ACP_Federal_Revenue_and_Economic_Impacts_from_BOEM_Offshore_Wind_Leasing.pdf

National Renewable Energy Laboratories ("NREL") analysis of offshore wind development in the Gulf of Mexico found that a single 600 MW offshore wind facility "could support approximately 4,470 jobs and $445 million in GDP during construction and an ongoing 150 jobs and $14 million annually from operation and maintenance labor, materials, and services." If BOEM were to issue a large lease sale accommodating even a small fraction of the technical capacity of the gulf—for instance, 5-10 GW—BOEM would provide the opportunity to create tens of thousands of jobs and generate billions of dollars annually. ACP encourages BOEM to issue lease sales that would generate this type of volume, as it is necessary to sustain supply chains and encourage further offshore development.

The Biden Administration has made clear that the deployment of clean energy is paramount to reaching the nation's climate goals. ACP applauds President Biden for making climate change mitigation a central priority of his Administration. In the Executive Order on Tackling the Climate Crisis at Home and Abroad (Climate EO), signed on January 27, 2021, President Biden called deployment of clean energy technologies, such as offshore wind, "critical for climate protection" and established that "[i]t is the policy of [the] Administration 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 … especially through innovation, commercialization, and deployment of clean energy technologies and infrastructure."[3] The Climate EO further calls for the executive branch to "accelerate the deployment of clean energy . . . in an environmentally stable manner."[4] Most recently, in a fact sheet issued by the White House, the Administration committed to exploring new wind energy areas in the Gulf in 2022.[5]

We urge BOEM not to underestimate the beneficial impact that electricity from offshore wind generation may have in the Gulf region. The reliability that offshore wind provides is an especially key benefit, especially in Texas and Louisiana where climate-fueled extreme weather

[3] Executive Order 14008, available at https://www.federalregister.gov/documents/2021/02/01/2021-02177/tackling-the-climate-crisis-at-home-and-abroad.
[4] Id.
[5] January 12, 2022, White House Fact Sheet: Biden-Harris Administration Races to Deploy Clean Energy that Creates Jobs and Lowers Costs, https://www.whitehouse.gov/briefing-room/statements-releases/2022/01/12/fact-sheet-biden-harris-administration-races-to-deploy-clean-energy-that-creates-jobs-and-lowers-costs/

events have recently caused catastrophic blackouts.[6] Gulf states have also made their own commitments to deploying clean energy or have a proven track record for doing so. For example, Louisiana's climate action plan, delivered to the Governor on February 1, 2022, calls for 5GW of offshore wind procurement by 2035.[7] According to the National Renewable Energy Laboratory, Louisiana ranks as the fourth highest state in the nation for offshore wind technical potential, with potential for a single offshore wind project to create 4,470 construction jobs and 150 full-time operations jobs.[8] And while Texas has not yet set any goals for offshore wind development, Texas is the leading state in the country for onshore wind generation, with more than 37 GW of energy online in 2020.[9]

For these reasons, we support BOEM's proposal to include the entire Call Area in the draft EA and not prematurely eliminate areas that have offshore wind development potential. BOEM has provided the opportunity for public input in two different RFIs in 2021, and has carefully evaluated, with the help of the GoM Task Force, what areas of the Gulf are best suited for offshore wind development. Because, under NEPA, BOEM would have to conduct another EA to add other areas of the Gulf at a later stage it does not consider, it is important that no potential area is not prematurely eliminated from consideration. These decisions will have lasting impacts on offshore wind development potential in the Gulf. Therefore, in order to achieve the goals of the Administration and have lasting impacts on states, BOEM should consider the full Call Area in the EA.

II. Incorporating Existing Studies, Institutional Knowledge, and Best Practices

For more than 40 years, BOEM's Environmental Studies Program has been supporting scientific research to inform policy decisions regarding the development of OCS in the Gulf. BOEM has a unique opportunity from this experience, and the existing studies it has generated

[6] For Texas, see https://www.washingtonpost.com/weather/2021/09/03/climate-change-arctic-texas-cold/; for Louisiana, see https://www.nytimes.com/2021/09/17/business/energy-environment/hurricane-ida-entergy-poweroutage-new-orleans.html.
[7] *See* Louisiana Climate Action Plan (Feb. 1, 2022) available at https://gov.louisiana.gov/assets/docs/CCI-Task-force/CAP/Climate_Action_Plan_FINAL_3.pdf.
[8] nrel.gov/news/program/2020/studies-find-gulf-of-mexico-well-positioned-for-offshore-wind-development.html
[9] ACP 2020 Clean Power Annual, at 16.

from those activities. In the February 2022 GoM task meeting, BOEM indicated that it intends to use previous BOEM GoM studies and institutional knowledge in developing the Draft EA.

ACP supports BOEM's use of its existing studies to efficiently and effectively develop the Draft EA. ACP also urges BOEM to rely on institutional knowledge and experience working with different stakeholders on energy development. These decades of successful offshore construction experience in the Gulf provide a solid foundation for offshore wind developers to work with BOEM to reduce use conflicts and balance multi uses, as well as identify existing infrastructure (i.e., platforms) and subsea rights-of-way. As stakeholders in the Gulf are already familiar with the process of balancing multi-uses, the engagement in later stages of any offshore wind planning will likely be robust and productive. The record clearly demonstrates that the OCS is amenable to multiple use management, and that potential conflicts in new areas can be effectively managed. Therefore, in developing the Draft EA, and for future lease activities, we urge BOEM to consider optionality and flexibility, consistent with existing studies, BOEM experience, and the co-use and co-location of existing energy leases.

III. Subject Matter Areas in the EA

We provide the following comments on the specific subject matter areas on which BOEM is conducting scoping for the draft EA:

- **Commercial and Recreational Fishing:** As an industry, we are committed to working with the commercial and recreational fishing industries of the GOM to achieve compatibility with fisheries, and we look forward to engaging with BOEM and fisheries on data, impact assessment, and mitigation approaches. We understand that responsible development of offshore wind requires early and repeated stakeholder outreach and improving the understanding of potential environmental and social impacts and opportunities to avoid, address, or capitalize on them. As noted above, there are decades of history of BOEM, the fishing industry, and the industry working together in the Gulf, and significant scientific work has been completed with regard to those activities. There clear benefits documented in fishing and scientific literature of the benefits of offshore structures to highly migratory and pelagic species, such as marlin,

tuna, amberjack, red snapper.[10] There are also concerns with the rate of decommissioning for existing offshore structures, as these create viable hard-bottom to support attraction and production of key species that would otherwise not exist in the Gulf. The offshore wind industry has the potential to provide new uses for otherwise decommissioned structures or create new structures that can provide a habitat to these species. The fishing industry also has a history of collaboration with National Centers for Coastal Ocean Science (NCCOS) to provide information to help assess suitability for aquaculture facilities in the Gulf of Mexico, and similar collaboration with BOEM can help to achieve compatibility between Critical Habitat and Essential Fish Habitat, offshore wind, and fisheries activities. BOEM and NMFS have developed guidance for collecting data on habitats and protected species during site characterization. We encourage BOEM to collaborate with local divisions of NMFS and USFWS and state agencies and continue to gather useful data for identifying and mitigating habitat risks, including the use of data that has been historically provided by other industries in the Gulf of Mexico.

- **Avian and bat species:** At this time, it would be premature to remove areas from consideration due to avian and bat concerns, and ongoing studies by BOEM, USFWS, USGS, and NMFS, such as the GoMAPPs[11] surveys, will be valuable for better understanding risks and supporting industry siting and mitigation measures to avoid and minimize impacts to birds and bats in the process of designating lease blocks and developing projects. We encourage BOEM to continue to support and conduct such studies. We note that any concerns that arise during scoping can be addressed through project-specific SAPs and COPs.

- **Marine mammals and sea turtles**: It would be premature to remove areas from consideration due to sea turtle and marine mammal concerns, and ongoing studies by BOEM, USFWS, USGS, and NMFS, will be valuable for better understanding risks and supporting industry siting and mitigation measures to avoid and minimize impacts to sea turtles and marine mammals in the process of designating lease blocks and developing

[10] https://afspubs.onlinelibrary.wiley.com/doi/full/10.1002/nafm.10678
[11] https://www.boem.gov/gommapps

projects. We encourage BOEM to continue to support and conduct such studies. We also note that Although some models predict that Bryde's whales could occur across other areas of the Gulf of Mexico, this population seems to be concentrated in one area, and this finding is supported by observations of Bryde's whales (and lack of observations in areas they do not inhabit) during geophysical surveys as well.[12,13] The Call Area under consideration by BOEM does not overlap the area where Bryde's whales mainly occur in the Gulf of Mexico, and the EA does not contemplate offshore wind-specific activities. Offshore wind would be unlikely to significantly affect Bryde's whales regardless, but the lack of overlap between Bryde's whales and the Call Area further reduces the likelihood of impacts. We note that any concerns that arise can be addressed through project-specific SAPs and COPs.

IV. Conclusion

We urge BOEM to continue to move the Gulf of Mexico leasing process forward expeditiously in order to provide the opportunity for future growth in commercial interest in offshore wind generation in the region. We look forward to working with BOEM as it makes progress to lease the Gulf region to offshore wind development.

Respectfully,

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American Clean Power Association

[12] Barkaszi, M.J., M. Butler, R. Compton, A. Unietis, and B. Bennet. 2012. Seismic survey mitigation measures and marine mammal observer reports. U.S. Dept. of the Interior, Bureau of Ocean Energy Management, Gulf of Mexico OCS Region, New Orleans, LA. OCS Study BOEM 2012-015. 28 pp + apps.
[13] Barkaszi, M.J. and C.J. Kelly. 2018. Seismic survey mitigation measures and protected species observer reports: synthesis report. U.S. Dept. of the Interior, Bureau of Ocean Energy Management, Gulf of Mexico OCS Region, New Orleans, LA. Contract No.: M17PD00004. OCS Study BOEM 2019-012. 220 p.