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KENNETH W. COOPER
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October 31, 2023

Submitted via Regulations.gov

Ms. Liz Klein
Director
c/o Jean Thurston-Keller, Project Coordinator
Bureau of Ocean Energy Management
Pacific Regional Office – Renewable Energy Section
760 Paseo Camarillo, Suite 102 (CM 102)
Camarillo, CA 90101

**Re: IBEW Comments on Docket No. BOEM- 2023-0033, Draft Wind
Energy Areas – Commercial Leasing for Wind Power
Development on the Oregon Outer Continental Shelf**

Dear Director Klein:

The International Brotherhood of Electrical Workers, AFL-CIO, CLC (IBEW) appreciates the opportunity to comment on the Bureau of Ocean Management's (BOEM's) Notice of Draft Wind Energy Areas (WEAs) for wind power development on the Oregon Outer Continental Shelf (OCS).¹ The IBEW is a labor organization representing approximately 820,000 active and retired members, with approximately 420,000 members working in the construction industry, including approximately 12,000 working in Oregon. These highly skilled and trained IBEW members routinely build and maintain all types of energy facilities throughout the United States, including offshore wind facilities.

The IBEW submits these comments to express our support for BOEM's proposed WEAs, which we believe will help address the climate crisis and meet both federal and state renewable energy targets, i.e., President Biden's goal of 30 gigawatts (GW) of offshore wind by 2030 and 15 GW of floating offshore wind by 2035, as well as Oregon's goal of 3 GW by 2030. The proposed WEAs represent sound environmental policy aligned with the Administration's goal of addressing the climate crisis² and would also support the Administration's goal of advancing equity by creating well-paying jobs and expanding job opportunities for disadvantaged and marginalized communities.

¹ *Notice of Draft Wind Energy Areas – Commercial Leasing for Wind Power Development on the Oregon Outer Continental Shelf*, Docket No. BOEM-2023-0033 (Oct. 11, 2023).

² Executive Order 14008, *Tackling the Climate Crisis at Home and Abroad*, 86 Fed. Reg. 7,619 (Feb. 1, 2021).



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As you know, time is running out to combat climate change and create good, local, union jobs through the expansion of offshore energy infrastructure. The IBEW therefore urges BOEM to take all available measures to expedite the approval of the proposed WEA for the Oregon coast.

Pursuant to the Outer Continental Shelf Lands Act (OCSLA) subsection 8(p)(1)(C), the Secretary of the Interior, in consultation with relevant Federal agencies, may grant a lease, easement, or right-of-way on the OCS for activities that produce or support the production of energy from sources other than oil and gas.³ The Secretary must ensure that activities under this subsection are carried out in a manner that provides for twelve goals, including improvements to the environment and the furthering of national security interests.⁴ The Secretary must balance these goals as there may be conflict or tension among them. The Secretary retains “*wide discretion to weigh [these] goals as an application of her technical expertise and policy judgment.*”⁵

Achieving the Biden-Harris Administration’s renewable energy goals that are key to advancing equity and our national security interests, is dependent on the development of a robust offshore wind industry supported by good, union jobs. I urge BOEM to consider the significant and positive environmental and socio-economic impacts that approval of the proposed WEAs will have for the state of Oregon, the West Coast, and the entire nation.

As you know, urgent action is necessary because the Inflation Reduction Act (IRA) prevents BOEM from issuing new offshore wind leases unless, within the year preceding the issuance of the lease, BOEM holds at least one offshore oil or gas lease sale *and* offers sixty million acres for offshore oil or gas leases.⁶ BOEM’s last guaranteed offshore oil and gas sale is currently scheduled for September 2023,⁷ so September 2024 is now the deadline for offshore wind lease

³ 43 U.S.C. § 1337(p)(1)(C).

⁴ 43 U.S.C. § 1337(p)(4)(A)-(L).

⁵ See Secretary's Duties under Subsection 8(p)(4) of the Outer Continental Shelf Lands Act When Authorizing Activities on the Outer Continental Shelf (Apr. 9, 2021), <https://www.doi.gov/sites/doi.gov/files/m-37067.pdf> (emphasis added).

⁶ 43 U.S.C. § 3006(b)(2).

⁷ BOEM, *Lease Sale 261* (last visited Aug. 23, 2023), <https://www.boem.gov/oil-gas-energy/leasing/lease-sale-261>.



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sales unless Congress takes action to change this rule. Plus, BOEM's proposed five-year program for oil and gas leasing for 2023-2028 includes anywhere from zero to eleven lease sales, so BOEM may not satisfy the IRA's requirements for some time.⁸

I believe the proposed WEAs will support existing federal and state climate goals, and provide significant economic, social, and environmental justice benefits, including the ability to create good, union jobs, particularly in local and disadvantaged communities.

Once again, the IBEW appreciates this opportunity to comment and looks forward to assisting the Bureau of Ocean Energy Management in expanding our nation's offshore wind infrastructure.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Kenneth W. Cooper".

Kenneth W. Cooper
International President

KWC:mea

⁸ BOEM, 2023-2028 National Outer Continental Shelf Oil and Gas Leasing Proposed Program 4 (July 2022), https://www.boem.gov/sites/default/files/documents/oil-gas-energy/national-program/2023-2028_Proposed%20Program_July2022.pdf; see Cong. Rsch. Serv., *Offshore Wind Provisions in the Inflation Reduction Act 1* (Sept. 29, 2022), <https://crsreports.congress.gov/product/pdf/IN/IN11980> (explaining that some of BOEM's leasing scenarios "would offer sufficient sales and acreage to meet the IRA's criteria for enabling offshore wind leasing while others would not.").