

December 9, 2024

**Re: Notice of Request for Comment Related to the Bureau of Ocean Energy Management Environmental Justice Strategic Plan**

**Submitted by the New Jersey Environmental Justice Alliance and the Ironbound Community Corporation to the Bureau of Ocean Energy Management within the U.S. Department of the Interior**

The New Jersey Environmental Justice Alliance (NJEJA) and the Ironbound Community Corporation (ICC) respectfully submit our comments to the Bureau of Ocean Energy Management (BOEM) within the U.S Department of the Interior in the matter of BOEM's request for comment on their draft Environment Justice Strategic Plan for 2024-2028<sup>1</sup>.

Founded in 1969, Ironbound Community Corporation (ICC) aims to empower and engage individuals, families, and groups in realizing their aspirations and work together to create a just, vibrant, and sustainable community. ICC envisions a safe, healthy, just, and nurturing Ironbound, a fully inclusive community supporting equal and accessible opportunities and the quest for a better life. The organization's Environmental Justice and Community Development Team advocates for systemic change to promote Environmental Justice in New Jersey and beyond, especially for EJ communities. By centering the experiences and perspectives of the communities most impacted by environmental injustice, ICC believes we can create a more equitable and sustainable future for all.

The New Jersey Environmental Justice Alliance (NJEJA) is a statewide organization mobilizing other environmental justice (EJ) organizations and individuals in order to increase the quality of life and upward mobility opportunities for EJ communities (low-income communities and communities Of Color), many of whom experience additional burdens resulting from histories of systemic racism.<sup>2</sup> NJEJA is the only statewide organization in New Jersey that is exclusively dedicated to environmental justice work, and we have a board, staff, and membership that is

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<sup>1</sup> We have located the Environmental Justice Strategic Plan via the PDF posted online at <https://files.constantcontact.com/1c8548c2201/a61248d8-78d7-4574-92b2-4bace92516a1.pdf?rdr=true>.

<sup>2</sup> For more information about the New Jersey Environmental Justice Alliance, please visit our website at <https://njeja.org/>.

predominantly people Of Color. Our work covers a wide range of areas but the principles and values of environmental justice practices are at the center of all we do, and we believe that the community's vision of improvement will always be the most effective and an important part of strategic development.

ICC and NJEJA respectfully submits these comments and answers to the suggested [questions](#) in an effort to support BOEM in their effort to “provide a framework for integrating environmental justice into BOEM’s mission and decision-making...” to “... ensure that BOEM consistently applies sound science, traditional knowledge, and inclusive methodologies to understand communities with environmental justice concerns and how BOEM-authorized activities could impact them”<sup>3</sup>, through their Environmental Justice Strategic Plan.

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<sup>3</sup> <https://files.constantcontact.com/1c8548c2201/fdd5c37f-c285-4055-b38c-c58ca5778d54.pdf?rdr=true>

**1. Do the draft vision, goals, and priorities serve your needs and interests about the advancement of environmental justice at BOEM? Why or why not?**

a. Goal 1:

- i. Priority 1.1 & 1.2: BOEM should ensure that all efforts to increase awareness and understanding of Environmental Justice policies and directives as well as learnings of Environmental Justice principles should come from the lessons, knowledge, and experiences of Environmental Justice communities and leaders themselves. These communities can be identified through state or federal tools such as the EJ Screen. Similarly, any staff hired to implement BOEM's Strategic Plan (i.e an Environmental Justice Coordinator) should preferably have experience either working with or living within an Environmental Justice community.

b. Goal 3:

- i. Priority 3.2: BOEM should ensure that building and improving partnerships is not an extractive process, but rather a collaborative process that moves at the speed of trust. Opportunities for collaboration include training community members to provide comment, providing educational sessions and materials, and - where possible - providing compensation for knowledge provided. Furthermore, it is imperative to underscore that collaborative and relationship development is a slow moving process, as agencies such as BOEM seek to build trust with communities which have been historically overlooked and/or harmed.

**2. What goals and priorities may be missing?**

- a. Goal 1 should incorporate principles of ethical supply chain for critical mineral security given that BOEM specifies its unique role in supporting energy and critical mineral security. As the clean energy<sup>4</sup> transition - a component of the Just Transition<sup>5</sup> - continues to ramp up and clean energy solutions become an increasingly large component of states' energy portfolios, it is essential that

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<sup>4</sup> For the purpose of these comments, we define clean energy as energy generation that neither exacerbates climate change nor contributes to local air pollution levels.

<sup>5</sup> Please see more information about the Just Transition on our partner's webpage at <https://climatejusticealliance.org/just-transition/>.

BOEM recognizes the need for ethical supply chains for critical minerals that do not perpetuate further harm in communities.

- b. Goal 2 should not only consider the capacity of staff to engage in outreach and engagement, but also the capacity of Environmental Justice communities and organizations BOEM engages with. At the community and community-based organization (CBO) level, there is often limited capacity to fully and consistently engage in initiatives and engagement activities that require significant amounts of time and dedicated/ongoing effort. To this point, BOEM should consider working with CBOs to understand their capacity level and provide resources to increase capacity in order to fully and meaningfully participate in outreach and engagement activities. Opportunities include grant-making processes in which CBOs have access to unrestricted funding with which they can ramp up capacity. Other areas of opportunity include bringing on community members as experts in roundtables, panels, and engagement sessions where they can be compensated for their time.

In addition to developing feedback processes to receive and *address* input, BOEM should focus on ensuring that feedback is driving the very processes BOEM uses. BOEM should be relying specifically on input from Environmental Justice communities, leaders, and organizations to guide their processes for both outreach and engagement activities as well as project development. As articulated above, BOEM should not only receive, but robustly address input in live public events and in writing to community members who respond to public comment. Additionally, BOEM should not move forward with any project that receives significant opposition and/or concern from Environmental Justice communities unless and until these concerns have been remedied and the community gives their explicit consent.

**3. How should BOEM work with you to implement the goals and priorities of this Strategic Plan in practice?**

As the climate crisis worsens and the dire need for clean energy solutions increases, it is crucial that frontline, frontline and Environmental Justice communities lead and are visible at the forefront of the energy transition. Enhancing public participation in agency decision making is crucial for BOEM to implement the goals and priorities of this Strategic Plan. However, there must also be equal effort to carve pathways for public participation to be the driver of agency decision making, rather than a passive goal. In this, BOEM can ensure that they are meeting the goals of “Free, Prior and Informed Consent” where communities are active participants, not just a pliant piece of the puzzle.

BOEM must support robust, meaningful, and long standing engagement in Environmental Justice communities, Environmental Justice organizations, and community based organizations in overburdened and underserved communities. Throughout all steps of activities and projects facilitated by BOEM, including and importantly, the planning, leasing and permitting stages, BOEM should be providing ample and well-in-advance opportunities for community organizations and members to be involved in engagement activities such as stakeholder meetings, listening sessions, education initiatives, and workshops. Furthermore, materials must be made accessible, digestible, and in plain language which any community member can utilize. We also encourage development of materials in multiple languages so as to increase opportunities for engagement in the public comment period.

Likewise, targeted outreach should be made to relevant CBOs and leaders to begin relationship building. BOEM should provide resources and capital to CBOs and community leaders within project areas to increase programmatic reach. Similarly, engagement activities should be available in virtual/hybrid and multiple time options, have recordings available for those unable to attend live, and provide resources to community members such as child-care and food. Together, these considerations will lessen barriers that would otherwise prevent community members and organizations from

fully participating in engagement activities, weave community knowledge into all BOEM initiatives, and ensure federal agency accountability within the communities where development is planned/ongoing.

**4. What performance measures or metrics should BOEM establish to monitor progress towards advancing environmental justice and achieving the goals and priorities in this Strategic Plan?**

BOEM can consider the following metrics in monitoring progress towards advancing Environmental Justice:

1. Amount of community members and community organizations (non-profits, faith based groups, neighborhood associations, etc.) engaged in BOEM initiatives;
2. Quantity and quality of community education and participation activities created;
3. Clear tracking of how Outer Continental Shelf (OCS) lifecycle and overall projects have changed over time in direct response to community concerns.

Ironbound Community Corporation and New Jersey Environmental Justice Alliance appreciate this opportunity to provide input on the Bureau of Ocean Energy Management's Environmental Justice Strategic Plan. We would welcome the opportunity to discuss any of the ideas contained in these comments with BOEM.

Respectfully submitted,

Vanessa Thomas  
Environmental Justice Organizer, Ironbound Community Corporation  
[vthomas@ironboundcc.org](mailto:vthomas@ironboundcc.org)

Brooke Helmick  
Director of Policy, New Jersey Environmental Justice Alliance  
[brooke@njeja.org](mailto:brooke@njeja.org)  
909-919-4318