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TO BOEM PUBLIC COMMENTS
SOUTH FOR WIND FARM DRAFT EIS
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On behalf of the Long Island Federation of Labor and our 250,000 union members and their families, I want to thank you for bringing forward the Draft Environmental Impact Statement for the South Fork Wind Farm.

This is a project of major significance to the Long Island labor movement. Moving this offshore wind project forward will have a positive impact on other wind developments in the pipeline and make possible the creation of thousands of new jobs. The South Fork Wind project is vital to the fight against climate change, improving public health, addressing longstanding environmental justice issues, and restarting the economy in the wake of the COVID-19 Pandemic.

The South Fork Wind Project is a 132 MW project that will be located more than 35 miles off the coast of Montauk Point. This will be the first offshore wind project to connect into New York and help the state, and the Town of East Hampton meet its 100% renewable energy goal. A joint venture between Orsted and Eversource, the project consists of up to 15 turbines and a state of the art transmission system that will generate enough clean energy to power 70,000 homes. It will displace millions of tons of carbon emissions, the equivalent of taking 60,000 cars off the road.
New York State has 4,300 MW worth of projects in the pipeline, with a state mandate to achieve 9,000 MW of Offshore Wind Energy Production by 2035. These projects represent a once in a generation opportunity to establish a new industry with family sustaining careers that support good pay and benefits leading to stronger communities. For the South Fork Wind project, Orsted and Eversource have committed to working with contractors who will employ the members of the Building and Construction Trades Council of Nassau and Suffolk Counties. Offshore wind projects like the South Fork Wind Farm are crucial to helping revitalize the renewable energy industry and providing new and sustainable employment opportunities for the skilled workforce of organized labor.

Representing the Long Island Federation of Labor I have personally had the opportunity to participate in the establishment of a National Offshore Wind Training Center with our partners from labor, Suffolk County Community College and Orsted/Eversource. A grant from the developer is making this community benefit possible. This is just one very significant example of the cooperation and diligence exercised by Orsted/Eversource to bring economic benefits to New York’s communities.

It is the position of our labor movement that Americans should not have to choose between a good job and a clean environment—we can and must have both.

South Fork Wind submitted its Construction and Operation Plan to BOEM in 2018 and has continued to work hard to collect data to provide all agencies and stakeholders with information on the benefits and potential environmental impacts of the project. We understand that the majority of the impacts in the DEIS are moderate or below; and the developer is committed to addressing higher rated impacts through mitigation and discussions with stakeholders.

For example, South Fork Wind has gone through an exhaustive process to establish a 1 x 1 Nautical Mile layout based on stakeholder feedback. The 1 x 1 NM layout eliminates a
significant portion of the federal lease area’s potential energy production but addresses the main comments from the commercial fishing industry regarding the need for transit lanes to ensure safe navigation. The 1 x 1 NM uniform layout creates safe transit lanes that the United States Coast Guard (USCG) has determined this type of “standard and uniform grid pattern” layout would “maximize safe navigation” in Wind Energy Areas (WEAs). (MARIPARS, 32)

We ask you to reject the alternative, which calls for a 4 x 4 Nautical Mile layout. The 4x4 NM layout threatens the viability of this industry and provides no benefit. Additional transit lanes will result in substantial technical challenges, delays, cost increases to consumers, and more environmental impacts from offshore wind development. It offers marginal gains, and, as USCG identifies, potentially greater conflict among transiting and fishing vessels that are “funneled into the corridors thereby increasing traffic density and risks for vessel interaction.” (MARIPARS, 7). The 1 x 1 nautical mile layout is already greater than that of any existing offshore wind project in the world.

In addition, the developers have been diligent in their commitments to the host community in East Hampton. The East Hampton Town Board and Trustees have conveyed real estate rights to the preferred route leading to Beach Lane because they believe it minimizes impacts to the whole community.

Representatives of the Wainscott community where the cable will be installed participated in ten months of settlement negotiations that led to the extensive permit conditions that have been endorsed by five state regulatory agencies. Among other conditions, the project will adhere to a series of construction restrictions which will minimize disruption to residents and avoid construction on town roads during the peak summer season.

South Fork Wind, coupled with two other projects to be sited off Long Island, offers meaningful opportunities for economic development and the creation of good-paying union and green-economy jobs. Long Island can become the center for an offshore wind workforce that rebuilds
our economy post-COVID and combats climate change. For the industry and an American supply chain to grow and reach its true potential, permitting certainty and clarity is critical. I want to thank BOEM for moving this process forward.