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Peter J. Schrappen, CAE
Vice President – Pacific Region

March 22, 2024

California Energy Commission
Docket Unit, MS-4
Docket No. 17-MISC-01
715 P Street
Sacramento, California 95814

Re: AB 525 Strategic Plan
(Docket No. 17-MISC-01)

Dear California Energy Commissioners:

The American Waterways Operators (AWO) is the tugboat, towboat and barge industry's advocate, resource, and united voice for safe, sustainable, and efficient transportation on America's waterways, oceans, and coasts. Our industry is the largest segment of the nation's 40,000-vessel domestic maritime fleet and moves 665 million tons of cargo each year safely and efficiently. On behalf of AWO's more than 300 member companies, we appreciate the opportunity to comment on the Draft California Energy Commission Assembly Bill 525 Offshore Wind Strategic Plan.

AWO members lead the maritime industry in safety, security, and environmental sustainability. We are committed to working with federal and state agencies to advance these shared objectives. Our commitment to sustainability includes strong support for the development of renewable energy resources, which our members will play an important part in developing. However, such projects should not jeopardize navigation with hazards that put vessels and their crews at risk or obstruct the movement of essential commodities. With these concerns in mind, we will continue to work closely with both federal and state partners on offshore wind energy development.

The strategic plan recognizes the important role our industry will play in the construction of offshore wind platforms. It also acknowledges the need for additional vessels to fulfill this need as well as a properly trained workforce. Funds and support for vessel construction and retrofits along with workforce development programs will help build the supply chain needed to meet California's ambitious offshore wind goals. However, the availability of vessels will ultimately be hampered by the California Air Resources Board commercial harbor craft regulation, as noted in the strategic plan. Due to the extreme burden placed on vessel operators

in California, many companies will likely pull out of the California market, leaving an insufficient number of operators capable of moving offshore wind components.

An area of concern with the strategic plan is the absence of an analysis of potential impacts to commercial navigation in Chapter 4: Potential Impacts of Offshore Wind and Avoidance, Minimization, and Mitigation Strategies. Safe navigation along California's coast is essential to the state's economy. More than \$34 billion worth of agricultural products are moved on California waterways each year, and more than 50,000 jobs in California depend on maritime transportation. The strategic plan must take into account how offshore wind will impact navigation safety. Safety impacts from changing navigation routes, obstructions placed in the waterways, and increased vessel traffic caused by offshore development are a few possible concerns. Chapter 4 of the strategic plan should analyze these issues, and any others that arise.

While offshore wind promises environmental and economic benefits, human safety must remain paramount. Put another way: We should not jeopardize navigation safety as we develop this exciting new field of renewable energy.

Thank you for the opportunity to comment on this emerging issue. AWO would gladly answer any questions or provide further information as you see fit. Our 80-year history demonstrates our commitment to tugboats, towboats, and barges moving safely through our nation's waterways while serving the nation's supply chain.

Sincerely,

A handwritten signature in black ink, appearing to read "Peter Schrappe". The signature is written in a cursive, flowing style.

Peter Schrappe
Vice President – Pacific Region