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Comments on Prop 4 funding

Additional submitted attachment is included below.



May 21, 2026

CEC Comments: Proposition 4 Offshore Wind Port Development Program

To Whom it May Concern,

California's Proposition 4 Offshore Wind Port Development Program arrives at a pivotal moment of energy supply disruption. California's major Pacific Rim allies and businesses have coastlines and wind resources that are also suited to floating wind generation. We should work with other Pacific nations to collaborate, especially on floating platforms constructed in California sites.

The comments below are submitted to help the CEC design a solicitation that will help encourage: maritime floating platform manufacturing and assembly capability in a regionally coordinated Solano County maritime corridor anchored by Cal Maritime, the Port of Benicia, and Mare Island. This corridor offers excellent geographic advantages, is technically capable, and positioned to support California's offshore wind goals.

Sincerely,

A handwritten signature in black ink, appearing to read "Kevin Jackson".

*Kevin Jackson, PhD.
Principal Engineer*

CEC Comments: Proposition 4 Offshore Wind Port Development Program

Comment 1 — Make Multi-Purpose Floating Wind + Floating Platform Manufacturing

The CEC's current program framing focuses on "manufacturing, assembly, staging, and integration" of offshore wind generation components. Given the uncertainty in Federal policy it is difficult to predict when commercial development of floating offshore platforms in Federal waters will be possible. The offshore wind business would likely be more viable in California if more funding options for floating platform development were available.

I would like to encourage the CEC to adopt a broad view of maritime platform design, manufacturing, and operation. For example, 1) Aikido has proposed AI compute in wind turbine foundations and 2) Nautilus operates an energy efficient floating data center in Stockton. These two companies have offices in the Bay Area. They provide relevant examples for potential maritime integration products that are consistent with building State capacity for offshore wind platform manufacturing, deployment, and operation.

Funding for offshore platform development through e-computing could provide financially viable market that can build offshore platform manufacturing, deployment, and operational experience much earlier than when offshore wind projects are ultimately installed in California. The range of floating wind products could include e-computing, e-transport, e-fuel, or e-fertilizer. I would suggest that the goal should be for local manufacturing, assembly, and commissioning of hardware for a broader class of floating maritime infrastructure — semi-submersible platforms with computing, battery storage, and gensets or integrating chemical processing of e-fuels — that the current framing may inadvertently exclude. Early platforms may be designed for inland waters and might not have wind turbines installed.

The CEC should explicitly clarify that eligible projects include port infrastructure supporting the fabrication, assembly, and outfitting of floating maritime energy platforms beyond conventional wind turbine components — including semi-submersible hulls, integrated power systems, and modular maritime computing infrastructure. The emerging floating offshore wind sector in California will include novel multi-use platforms (combining energy generation, storage, and computing) that are not captured by traditional turbine-component framing. Excluding these platforms from Prop 4 eligibility would leave California's most innovative offshore infrastructure projects without a funding pathway.

The CEC should explicitly confirm that ports serving integrated floating offshore wind + offshore AI data center + e-fuel manufacturing, assembly, and staging are eligible under PRC Section 94540(a). The statute authorizes "manufacturing, assembly, staging, and integration of entitlements and components for offshore wind generation." Example projects might include AI compute modules as components integrated into the offshore wind platform — they share the hull, power, and mooring system. The CEC should state that platform-integrated load (AI, desalination, hydrogen production) qualifies as "offshore wind generation infrastructure" rather than creating a separate ineligible category.

Comment 2 — Designate Benicia and Mare Island as an Offshore Wind Platform Integration Hub

The Port of Benicia possesses rare deep-water access on Carquinez Strait with existing rail, freeway, and maritime connections designated as a Priority Production Area by MTC/ABAG. The GHD-prepared Facilities and Infrastructure Modernization Plan identifies \$290–\$325 million in investments to convert

the port for offshore wind manufacturing and fabrication. **The CEC should recognize Benicia as a Tier 1 manufacturing priority site in the Prop 4 solicitation**, with funding directed toward:

- Structural upgrades to accommodate heavy-lift manufacturing loads for semi-submersible hull components
- Expansion of laydown and fabrication areas on the Amports parcels adjacent to the port
- Rail-to-marine transfer infrastructure for large component delivery
- Permitting pathway alignment between the City of Benicia, Amports, and prospective offshore wind manufacturing OEM partners

The Benicia Refinery transition — as Valero evaluates its long-term operations — presents an additional opportunity to repurpose adjacent industrial land for advanced maritime manufacturing. **The CEC should condition Benicia port funding on a coordinated land-use planning process that includes the former Valero refinery parcels as potential manufacturing expansion zones.**

Mare Island Dry Dock in Vallejo represents a floating offshore wind assembly asset. Unlike greenfield port development sites requiring years of permitting, Mare Island's dry docks, marine railway, outfitting piers, and industrial infrastructure are commercially certified and operational today. The facility can begin floating platform assembly quickly.

The CEC should allocate Prop 4 funds for Mare Island to:

- Dry dock rehabilitation: Refurbishment of Dry Dock 2 (720 ft × 98 ft) for floating semi-submersible platform assembly, including fresh water and electrical service upgrades
- Crane capacity upgrade: Addition of heavy-lift crane capacity (500–1,000 tonne) for semi-sub column and pontoon assembly
- Outfitting pier expansion: Extension of outfitting berths for parallel platform integration work (power modules, turbine interfaces, compute enclosures)
- Workforce development: Apprenticeship pipeline with Solano Community College, Cal Maritime, and the Building Trades for semi-sub assembly, marine electrical, and offshore systems integration

Mare Island's revival is not contingent solely on offshore wind — it is already being considered for US Navy ship repair and SHIPS Act maritime prosperity zone designation. Prop 4 investment in Mare Island infrastructure therefore leverages multiple federal and state funding streams simultaneously, maximizing the public return on CEC grant dollars.

The Bay Delta maritime corridor — comprising the Port of Benicia, Mare Island in Vallejo, and the Sacramento River Delta industrial corridor to Stockton and Sacramento — functions as an integrated regional ecosystem for floating offshore wind manufacturing and assembly. The CEC should resist

framing the Prop 4 solicitation as a competition between individual ports and instead adopt a regional port system approach recognizing:

Benicia: Component manufacturing and fabrication (hull sections, power module enclosures, structural steel) — benefiting from the Priority Production Area designation and heavy industrial adjacency

Mare Island: Final platform assembly, systems integration, outfitting, and tow-out — benefiting from the existing dry docks, marine infrastructure, and deep-water Carquinez Strait access

Sacramento River Delta (Stockton, Pittsburg, Antioch, Collinsville): Large-scale laydown and logistics for oversized components requiring barge transport

A coordinated Solano County maritime strategy — already supported by resolutions from Fairfield, Suisun City, Rio Vista, and Benicia City Council — would position the region to serve the full floating offshore wind platform supply chain from raw fabrication through completed platform delivery. **The CEC should use its Prop 4 funding authority to incentivize formal coordination agreements among these sites as a grant condition.**

Comment 3 — Include Match Funding Credit for International Consortium Commitments

Federal funding and approvals for offshore wind may not be advancing for a long period of time. The CEC scoring gives extra points for "cash or in-kind match" and "demonstrated federal commitment of funds." **The CEC should consider how to include international consortium industrial commitments (for hull fabrication contracts, co-investment letters, eligibility letters) as qualifying match funding equivalents.** Current solicitation language focuses on federal match which systematically disadvantages consortium-backed applicants with Pacific Rim public financing that is functionally equivalent to DOE grants.

Comment 4 — Include a "Floating Platform Integration Port" Category

The CEC's current framework distinguishes between staging/integration ports and manufacturing ports. Neither category precisely captures what Benicia and Mare Island could do: final assembly of semi-submersible platforms from pre-fabricated Korean hull sections and Japanese turbine components, integration of compute modules, cooling systems, battery banks, and genset systems, through pre-commissioning testing, and tow-out.

This is neither traditional "manufacturing" (raw materials to finished product) nor "staging" (temporary storage before installation). **The CEC should consider a "floating platform integration port" category with its own criteria, closer to the shipyard outfitting model than the conventional port crane/laydown model.** There is substantial waterfront access and anchorage locations that may be useable as brownfield development from the former Valero refinery closure.

A new category allows the CEC to set criteria that Benicia and Mare Island can realistically meet (deepwater access, industrial land, crane capacity, tow-out channel) rather than criteria designed around Long Beach-style fixed-bottom staging operations (enormous laydown areas, heavy-lift marine vessels, wave-action protection).

Comment 5 — Include Workforce Development Scoring Credit for Cal Maritime Partnership

Cal Poly Maritime Academy (Cal Poly Maritime), located in Vallejo adjacent to both Mare Island and the Port of Benicia, is uniquely positioned to serve as the workforce development and applied research anchor for the Solano County floating offshore wind manufacturing corridor. Cal Maritime's existing programs in marine engineering, power systems, and maritime operations align directly with the technical skills required for floating platform assembly, offshore systems integration, and marine operations.

The funding for Cal Maritime might include:

- Develop offshore wind platform technician curriculum aligned with GWO (Global Wind Organisation) and OPITO offshore safety standards
- Establish a floating platform systems integration lab in partnership for hands-on training
- Conduct applied research on semi-submersible platform performance, mooring systems, and offshore power systems integration in collaboration with industry partners

Public engagement through Cal Maritime — already identified as a stakeholder in the Port of Benicia planning process — ensures that the workforce pipeline serves local communities in Solano County and creates pathways for Unrepresented communities historically tied to the Mare Island Naval Shipyard workforce.

Cal Poly Maritime provides a quantified workforce pipeline: Cal Poly Maritime graduates hundreds of U.S. Coast Guard certified maritime engineers and deck officers, and provides curriculum relevant to offshore energy systems. The ability to formally and intimately involve Cal Poly Maritime Faculty and Students is a critical opportunity that differentiates Benicia and Mare Island from ports without a co-located maritime education institution.