

DOCKETED

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**Comments on AB 525 CEC Draft Report on Offshore Wind
Development off the California Coast**

Additional submitted attachment is included below.

May 23, 2022

California Energy Commission
Docket Office
1516 Ninth Street
Sacramento CA 95814

Submitted electronically in response to Docket No. 17-MISC-01

Re: Comments on May 2022 Assembly Bill 525 CEC Draft Report on Offshore Wind Development off the California Coast: Maximum Feasible Capacity and Megawatt Planning Goals for 2030 and 2045

On behalf of the members of the Pacific Merchant Shipping Association (PMSA), we appreciate the opportunity to provide comments on the draft “Offshore Wind Development off the California Coast: Maximum Feasible Capacity and Megawatt Planning Goals for 2030 and 2045” report (AB 525 Report). PMSA is a nonprofit trade association which represents owners and operators of U.S. and foreign flagged vessels operating along the U.S. West Coast. As such, we offer the following comment on engagement with potentially impacted waterway users.

A strategic plan such as this is crucial to ensure the most efficient, cost effective and least impactful offshore wind energy projects are deployed to realize California’s ambitious energy goals. California is world renowned for its many resources; one more recently identified renewable resource to exploit being that of offshore wind. Waters offshore of the state hold many of California’s invaluable resources and witness many waterway uses, including for pleasure, cultural, industrial and commercial operations. The AB 525 Report lists draft goals of 3 GW by 2030, 15 GW by 2045, and up to 20 GW by 2050, which are indeed laudable goals; however, will require identifying significant additional capacity for, and siting of, offshore wind farms. When these capacity and siting questions are being contemplated, it is of critical importance that issues of navigational safety and maritime commerce, along with all other shared activities and waterway stakeholder impacts, be appropriately considered.

One of the 12 identified factors AB 525 requires the California Energy Commission to consider is assessing the potential impacts to stakeholders. Ocean-going vessel traffic and the commercial maritime industry are such stakeholders with whom it is critical to coordinate for “avoiding, minimizing, and managing” potential impacts. Such coordination is required to be analyzed prior to identifying suitable sea space, with the goal of prioritizing least-conflict ocean areas and doing comprehensive planning.

The maritime industry has thus far not experienced satisfactory engagement on this subject matter by the Bureau of Ocean Energy management (BOEM), which is tasked with the federal

efforts to initiate, lease and manage wind energy projects in federal waters, including offshore California. PMSA is optimistic that the CEC, along with the many other state agency stakeholders, can construct a better and more comprehensive model for engagement and collaboration with waterway users for offshore wind energy projects. We will continue to reach out to BOEM to rectify its lack of proactive communication, but in the meantime, California has the opportunity to set a more-inclusive standard for addressing these ocean spatial planning issues in a way which adequately includes commercial waterway users and navigational safety concerns. Looking ahead to the implementation of the Governor's proposed \$45 million for offshore wind projects, we not only believe that such engagement is critically necessary for future planning but that it is necessary to create these lines of communication now in anticipation of projects in the near future.

PMSA looks forward to collaborating with CEC to ensure the most feasible and least impactful offshore wind energy projects. Please do not hesitate to contact me at your convenience should there be any questions.

Respectfully,

A handwritten signature in cursive script that reads "Jacqueline M. Moore". The signature is written in black ink on a light-colored background.

Jacqueline M. Moore
Vice President