| DOCKETED | |
|---|---|
| **Docket Number:** | 17-MISC-01 |
| **Project Title:** | California Offshore Renewable Energy |
| **TN #:** | 247500 |
| **Document Title:** | Bardex Corporation Comments - on CEC Workshop on AB 525 Assessing California Seaports for Offshore Wind |
| **Description:** | N/A |
| **Filer:** | System |
| **Organization:** | Bardex Corporation |
| **Submitter Role:** | Public |
| **Submission Date:** | 11/16/2022 4:35:49 PM |
| **Docketed Date:** | 11/16/2022 |

*Comment Received From: Bardex Corporation*
*Submitted On: 11/16/2022*
*Docket Number: 17-MISC-01*

## on CEC Workshop on AB 525 Assessing California Seaports for Offshore Wind

*Additional submitted attachment is included below.*

Bardex Corporation appreciates the opportunity for public comment on the CEC Workshop on AB 525 Assessing California Seaports for Offshore Wind.

We'd like to commend Matt Trowbridge for his thorough presentation during the CEC Workshop on Assembly Bill 525 Assessing CA Seaports for OSW.

Developing offshore wind power at scale requires an enormous investment of effort and funding. We believe that planning for the maintenance infrastructure offshore power generation will require in the decades following initial deployment to continue at peak performance must be an integral part of any new facilities.

We are pleased to see that Operation and Maintenance facilities are included in the long-term port infrastructure plans. An important aspect of utility scale floating offshore wind generation is maintenance. Service operation vessels (SOVs) will perform this work, these vessels also require regular service and inspections to maintain classification and perform their assigned duties reliably.

Chain-based ship lifts offer several unique advantages including environmental stewardship, safety, and flexibility over either floating dry docks (FDDs) or wire rope shiplift systems.

**Environmental Stewardship:**

Selecting floating dry docks over shiplift systems for vessel maintenance is a grave disservice to our state and federal marine conservation efforts, including the proposed Chumash Heritage National Marine Sanctuary so passionately defended during the workshop and throughout the years-long offshore wind discussion. Floating dry docks release pollutants resulting from vessel maintenance work into the environment.

A ship lift and transfer system removes vessels from the water and transfers them onto shore for maintenance where pollution is contained, collected, and properly disposed of. Alternatively, inspections and minor repairs are performed on the ship lift itself – crucially reducing the onshore space needed for refit activities – and environmental concerns are mitigated because the ship and supporting platform are entirely above and out of the water.

**Safety:**

Ship lifts provide a safer alternative to floating drydocks – the dangers of which are discussed in Kraup et al's *Problems of Ship Safety in the Process of Docking*.[1] The safety, economic, environmental damage, and inevitable political fallout resulting from a floating dry dock accident present an unacceptable risk.

**Flexibility:**

- Multiple Vessels can be berthed for maintenance simultaneously increasing the capacity & revenue of the shipyard.
- Delays in the repair or maintenance of any one ship will not have an effect on the schedule of maintenance for other ships.
- Logistics and flow of materials to and from the berthed vessel are unrestricted at yard level allowing for faster and safer ship repairs and resulting in more ships to be serviced in a short time.

Selected Problems of Ship Safety in the Process of Docking Kaup et al. - New Trends in Production Engineering - 2018

- Several lifts or launches per day are possible, allowing more ships to be serviced in a short time (Typically less than 1 hour to lift or lower a ship on the platform)

We are looking forward to following the progress of the AB 525 Seaport Strategic Plan and the long-term success of floating offshore wind in our home state.