



June 22, 2022

The Honorable Charles Schumer
Senate Majority Leader
S-221, The Capitol
Washington, DC 20510

The Honorable Mitch McConnell
Senate Minority Leader
S-230, The Capitol
Washington, DC 20510

The Honorable Maria Cantwell
Chairwoman
U.S. Senate Committee on Commerce, Science,
and Transportation
254 Russell Senate Office Building
Washington, DC 20510

The Honorable Roger Wicker
Ranking Member
U.S. Senate Committee on Commerce, Science
and Transportation
254 Russell Senate Office Building
Washington, DC 20510

Dear Leader Schumer, Leader McConnell, Chairwoman Cantwell, and Ranking Member Wicker,

As the Senate Commerce Committee begins consideration of the 2022 Coast Guard Authorization Act, we urge you to exclude a provision that would derail the nascent U.S. offshore wind industry—namely, the maritime crewing language in the House-passed *Don Young Coast Guard Authorization Act of 2022* (H.R. 6865) – and seek other solutions to reach our shared goal of maximizing the number of domestic mariners.

As written, the House maritime crewing provision is an existential threat to the future of offshore wind in the United States and the immediate result would be the delay and potential cancelation of the 19 offshore wind projects with power offtake contracts or awards. The provision would require, within 120 days of passage, that crews on specialized offshore international construction vessels match the flag of the vessel or be American mariners as a condition of working on the U.S. Outer Continental Shelf. Given the nascent domestic offshore wind industry, there are currently insufficient numbers of trained American mariners, as well as crew from the vessel’s flag state to man those vessels. The crewing provision would thus serve to block the use of these international specialized offshore vessels when there are currently no U.S.- flagged specialized construction vessels to do the work needed. The industry needs your support to build out domestic capacity and a formal forum to partner with vessel owners, maritime trades, and shipbuilders to advance a solution.

A focus on specialized construction vessels, which make up a small subset of the vessels used in the deployment of offshore wind, also draws attention away from the fact that a majority of the vessels used by the offshore wind industry will be made in America and crewed by U.S. mariners. Of the 25+ vessels used to construct, operate, and maintain an offshore wind project, including seafloor survey work, component transfer, turbine installation, and operations and maintenance, the majority will be U.S.-flagged and -crewed. In addition to the number of vessels, U.S.-flagged vessels such as crew transfer vessels and service operation vessels will have the greatest amount of vessel hours because they will perform all transportation activities between U.S. ports and offshore wind turbines during the approximately 35-year lifetime of the project. These activities over the multiple years of project operations will dwarf the months of construction engaged in by international ships on offshore wind energy projects, meaning American mariners will perform the vast majority of the job hours needed.



Offshore wind represents a tremendous opportunity for the American economy and we have already committed to at least \$4 billion in U.S.-flagged vessels, workforce training, and supply chain development. The first step Congress should take to promote continued American offshore wind growth is to focus policy solutions on the root cause of the problem: a lack of U.S. mariners, a shortage of U.S.-flagged ships, and uncertain timing of approvals on offshore wind Construction and Operations Plans. Vessel incentives, such as increasing funding for and reforming the MARAD Title XI program, increasing direct loans to U.S. vessel operators, and creating a “charter of last resort program” to de-risk investments in some of the largest U.S.-built offshore vessels could help spur needed investments.

Ultimately, the offshore wind industry and Congress have the same goal: maximizing the number of Americans employed in offshore wind, including mariners. Building out the domestic offshore wind industry will pay enormous economic development benefits and aggressive deployment of offshore wind will make a material contribution to our domestic energy security. We need reasonable policies and predictable permitting timelines, not impossible mandates that will drive a stake through the heart of the industry before we can get it off the ground. For these reasons, we urge you not to include the House-passed maritime crewing provision in the Senate Coast Guard Authorization Act of 2022. Thank you for your attention to these matters. Please do not hesitate to contact Claire Richer at the American Clean Power Association at cricher@cleanpower.org for further information or with questions.

Sincerely,

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